



CLALLAM COUNTY ECONOMIC DEVELOPMENT COUNCIL

June 10, 2022

Clallam County Hearing Examiner
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Re: Permit Application CUP No. 2021-00005 – Letter of Opposition

Hearing Examiner Reeves:

After substantial discussion and research, the Clallam County Economic Development Council's board voted on May 25, 2022 to submit a Letter of Opposition regarding the Olympic System's Properties' conditional use permit for a transfer station in Carlsborg.

Background about the Clallam County Economic Development Council (Clallam EDC):

Since 1981 the Clallam EDC has been the State and County-designated [Associate Economic Development Organization \(ADO\)](#). As such, the Clallam EDC is tasked to further the county's economic development and resiliency goals.

Our mission statement is, *"We partner to make Clallam County a great place for businesses to thrive and people to live. By working collaboratively, we catalyze business leadership, nonpartisan problem-solving and data-driven strategies to get results for our Cities and our County."*

Our Bylaws state, "It shall be the purpose of the Clallam County Economic Development Council (CCEDC) to define, support and promote policies and activities, which contribute to the economic stability and growth of Clallam County. Such activities include, but shall not be limited to: ...

- B. Assisting business expansion and industrial plant location;
- C. Assisting in the retention of existing businesses;
- D. Evaluating and proposing land use planning.

Items the Board Considered:

The 2021 **Clallam County Solid Waste Management Plan (CCSWMP)** which incorporated the Regional Solid Waste Export and Transfer System Interlocal Agreement between the cities of Port Angeles and Sequim and the County does not contemplate an additional transfer station in the county and states in the conclusions "the projected solid waste tonnages anticipated to be generated in Clallam County over the next 20 years..., these facilities appear to be adequate to handle these amounts. Significant expansions in the recycling of specific materials may require additional or expanded facilities in the future."

Appendix C of the 2021 CCWSP includes an evaluation of potential sites for solid waste facilities. It suggests 6 steps to follow for any public or privately owned solid waste facility. These were not followed in this CUP application.

(Page C-2.)

However, the Board did acknowledge the following quote by Anne Soules of the City of Sequim: “In light of an increasing growth rate in eastern Clallam County and increasing recognition that jurisdictions should limit carbon emissions when they are able to do so, certain operations of the “Regional Solid Waste Export and Transfer System” warrant closer cost benefit examination. For example, some questions specific to the transfer station at Blue Mountain serving east Clallam County regard whether the current location is adequately convenient and efficient (time, fuel cost, emissions, vehicle wear and tear) for the hauler and for residents, and whether existing rates and fees cover existing costs plus reserves for capital improvements at that site (in context of the Regional Transfer System as a whole). The Solid Waste Advisory Board briefly explored these and additional questions in October 2020, with the conclusion that a study could be recommended in the Plan, to be completed as soon as possible given that the existing contract for hauling and baling recyclables expires on January 1, 2027. (While the contract is between City of PA and Waste Connections, it has implications on all parties to the ILA and all residents and businesses in the service area.)”

The local municipal governments may determine in the future that a new solid waste transfer station with a recycling center at the east end of the county is in the best interest of the public, but the Carlsborg site is not an appropriate location in our opinion due to traffic issues.

Site Tour of Montesano Transfer and Recycling Facility: Waste Connections invited the EDC staff to visit a site one of their subsidiaries owns and operates in Montesano, WA. The facility was organized and clean with little-to no-smell emanating from the site. The dumped trash was processed quickly and placed into a large container to be hauled out. We observed only a few birds during our hour-long visit.

However, we toured the facility early on a Friday afternoon and observed a steady flow of traffic. The surrounding area consisted of large parcels of sparsely populated heavy industrial uses. Tree buffers kept the site hidden until you came upon the entrance. The Montesano – Grays Harbor Transfer Facility is located about ¼ mile from a major highway with very good highway access.

The Montesano site was significantly different from the proposed location in Carlsborg.

Traffic Impacts: Page 18 of the Traffic Impact Analysis dated November 2021, prepared by Waste Connections’ engineering consultant states, “Based on the count data, the proposed Olympic Disposal Transfer Station can be expected to generate 82 trips in the PM peak hour upon full capacity projections of approximately 250/tons per day of material processing. Approximately 35-40 percent of those trips would be in the form of heavy vehicles and/or non-commercial vehicles with an attached trailer. Site usage is expected with 55 percent of activity at the residential waste driveway, 25 percent at the recycle driveway, and 20 percent for the commercial waste driveway. Daily trips to and from the transfer station are estimated at 513 trips.”

	2019 Annual Tons Processed	Approx. Days Open/Year	Tons per day (2019)
Blue Mountain Transfer Facility (from CCSWMP)	1,238	150	8.25 Tons/day
Port Angeles Regional Transfer Facility (from CCSWMP)	52,727	300	175 Tons/day
Proposed Carlsborg Facility (from CUP Traffic Study)	75,000 (250 T/day*300)	300	250 Tons/day (at full capacity)

Greywolf Elementary School: The Greywolf Elementary School principal, Donna Hudson, wrote a letter opposing the Carlsborg Transfer facility due to the increased traffic. She is concerned about the 40+ students that walk to and from school along Carlsborg Rd. She also is concerned about the increase of emissions from the additional 513 daily trips to and from the transfer station as the children play during recess nearby.

There are no current plans in the County’s 6-year Transportation Improvement Plan to widen Carlsborg Road from Greywolf Elementary School to the proposed site. Mile Post 1.01 referenced below begins North of the proposed site and continues North to the intersection of Carlsborg Rd and Old Olympic Highway. The following is from page 8 of 49 of the Traffic Impact Analysis Report:

3.7 Roadway Improvements

A review of Clallam County's draft 2022-2027 Six Year Transportation Improvement Program indicates that the following improvement projects are currently planned in the vicinity. Descriptions of the nearest projects are provided below.

Table 2: Transportation Improvement Projects

Name	Location	Improvement	Cost
Carlsborg Road (P.N.: 94270)	Mile Post 1.01 to 1.76	Resurface, restore and widen the shoulder	\$828,000
Heath Road (P.N.: 45850)	Mile Post 0.00 to 0.68	Widen Shoulder	\$95,000
Kitchen-Dick Road & Old Olympic Hwy Roundabout (P.N.: 94170)	Intersection	Design and public input process for a roundabout for safety and traffic flow	\$100,000

Public Concern is Clear: There is clearly overwhelming concern by local business owners and residents which are represented on the website, www.Carlsborg.org and the [596 pages of public comments](#) submitted to the Clallam DCD opposing the Transfer Station CUP.

Zoning: [Carlsborg Industrial \(CI\)](#). “The purpose of the Carlsborg Industrial designation is to allow for low nuisance uses.” The EDC Board believes a “Municipal Solid Waste Transfer Station with a Commercial Recycling Consolidation Bay and Community Recycling Center” on the 5.46-acre parcel would not constitute a low nuisance use.

Conclusion:

In summary, the transfer station proposed in the application is inconsistent with the CCSWMP, would generate an immense amount of traffic not viable for the location, would create a safety hazard for Greywolf Elementary School, and is not supported by hundreds of members of the public. The application should be denied.

Sincerely,



Colleen McAleer
Executive Director