



# King County

1200 King County  
Courthouse  
516 Third Avenue  
Seattle, WA 98104

## Meeting Agenda Transportation, Economy, and Environment Committee

*Councilmembers:*  
*Steffanie Fain, Chair;*  
*Pete von Reichbauer, Vice Chair;*  
*Claudia Balducci, Reagan Dunn*

*Lead Staff: Jake Tracy (206-263-0875)*  
*Committee Clerk: Angelica Calderon (206 477-7470)*

**9:30 AM**

**Tuesday, February 17, 2026**

**Hybrid Meeting**

**Hybrid Meetings:** Attend the King County Council committee meetings in person in Council Chambers (Room 1001), 516 3rd Avenue in Seattle, or through remote access. Details on how to attend and/or to provide comment remotely are listed below.

Pursuant to K.C.C. 1.24.035 A. and F., this meeting is also noticed as a meeting of the Metropolitan King County Council, whose agenda is limited to the committee business. In this meeting only the rules and procedures applicable to committees apply and not those applicable to full council meetings.

**HOW TO PROVIDE PUBLIC COMMENT:** The Transportation, Economy, and Environment Committee values community input and looks forward to hearing from you on agenda items.

The Committee will accept public comment on items on today's agenda in writing. You may do so by submitting your written comments to [kcccomitt@kingcounty.gov](mailto:kcccomitt@kingcounty.gov). If your comments are submitted before 8:00 a.m. on the day of the meeting, your comments will be distributed to the committee members and appropriate staff prior to the meeting.

	<p>Sign language and interpreter services can be arranged given sufficient notice (206-848-0355). TTY Number - TTY 711.</p> <p>Council Chambers is equipped with a hearing loop, which provides a wireless signal that is picked up by a hearing aid when it is set to 'T' (Telecoil) setting.</p>	
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To show a PDF of the written materials for an agenda item, click on the agenda item below.

1. Call to Order
2. Roll Call
3. Approval of Minutes **p. 3**

*Minutes of January 20, 2026 meeting.*

### Briefing

4. [Briefing No. 2026-B0026](#) **p. 8**

Organic Waste and Construction and Demolition Waste Briefing

*Rebecca Singer, Solid Waste Division Director*

5. [Briefing No. 2026-B0027](#) **p. 70**

Metro South Link Service Restructure Briefing

*Katie Chalmers, Service Development Managing Director, Mobility Division, Metro*

*Nicole Aguirre, South Link Connections Service Planning Lead, Metro*

*Cristina González, Senior Community Engagement Planner, Metro*

### Other Business

### Adjournment

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## Meeting Minutes Transportation, Economy, and Environment Committee

**Councilmembers:**  
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*Pete von Reichbauer, Vice Chair;*  
*Claudia Balducci, Reagan Dunn*

**Lead Staff:** *Jake Tracy (206-263-0875)*  
**Committee Clerk:** *Angelica Calderon (206 477-7470)*

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9:30 AM

Tuesday, January 20, 2026

Hybrid Meeting

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### REVISED AGENDA

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1. **Call to Order**

*Chair Fain called the meeting to order at 9:32 a.m.*

2. **Roll Call**

**Present:** 4 - Balducci, Dunn, Fain and von Reichbauer

3. **Approval of Minutes**

*Councilmember von Reichbauer moved approval of the September 8, 2025 meeting minutes. There being no objections, the minutes were approved.*

**Briefing**

4. **Briefing No. 2026-B0009**

2026 TrEE Work Plan Overview

*Jake Tracy, Council staff, briefed the Committee and answered questions from the members.*

**This matter was Presented**

**Consent**

5. **Proposed Motion No. 2025-0281**

A MOTION confirming the executive's appointment of Kazia Mermel, who resides in council district two, to the King County waterworks grant ranking committee, as the metropolitan water pollution abatement advisory committee, city of Seattle representative.

**Sponsors:** Zahilay

*This item was expedited to January 27, 2026 Full Council meeting.*

**A motion was made by Councilmember von Reichbauer that this Motion be Recommended Do Pass Consent. The motion carried by the following vote:**

**Yes:** 4 - Balducci, Dunn, Fain and von Reichbauer

**6. Proposed Motion No. 2025-0282**

A MOTION confirming the executive's appointment of Kyle Wong, who resides in council district one, to the King County waterworks grant ranking committee, as the metropolitan water pollution abatement advisory committee, participant sewer district representative.

**Sponsors:** Dembowski

*This item was expedited to January 27, 2026 Full Council meeting.*

**A motion was made by Councilmember von Reichbauer that this Motion be Recommended Do Pass Consent. The motion carried by the following vote:**

**Yes:** 4 - Balducci, Dunn, Fain and von Reichbauer

**7. Proposed Motion No. 2025-0317**

A MOTION confirming the executive's appointment of Clare Semambo, who resides in council district nine, to the King County solid waste advisory committee, as a citizen representative.

**Sponsors:** Dunn

*This item was expedited to January 27, 2026 Full Council meeting.*

**A motion was made by Councilmember von Reichbauer that this Motion be Recommended Do Pass Consent. The motion carried by the following vote:**

**Yes:** 4 - Balducci, Dunn, Fain and von Reichbauer

**8. Proposed Motion No. 2025-0319**

A MOTION confirming the executive's appointment of Tyler Morgan, who resides in council district one, to the King County solid waste advisory committee, as an agriculture representative.

**Sponsors:** Dembowski

*This item was expedited to January 27, 2026 Full Council meeting.*

**A motion was made by Councilmember von Reichbauer that this Motion be Recommended Do Pass Consent. The motion carried by the following vote:**

**Yes:** 4 - Balducci, Dunn, Fain and von Reichbauer

## Discussion and Possible Action

**9. Proposed Motion No. 2025-0318**

A MOTION confirming the executive's appointment of Cynthia Dampier, who resides in council district seven, to the King County solid waste advisory committee, as a citizen representative.

**Sponsors:** von Reichbauer

*Jake Tracy, briefed the Committee on the legislation and answered questions from the*

members. There was amendment A1 and Title T1 moved by CM von Reichbauer, the amendments were adopted.

*This item was expedited to January 27, 2026, Full Council meeting.*

**A motion was made by Councilmember von Reichbauer that this Motion be Recommended Do Pass Substitute Consent. The motion carried by the following vote:**

**Yes:** 4 - Balducci, Dunn, Fain and von Reichbauer

## Briefing

### 10. Briefing No. 2026-B0010

Planning for 2026 FIFA World Cup

*Dylan Ordoñez, Seattle FIFA World Cup 2026; Vaughn Taylor, Vice President of Economic Development, Seattle Metropolitan Chamber of Commerce and Jonahatan Rose, FIFA Men's World Cup 2026 Program Director at Metro, briefed the Committee via PowerPoint presentation and answered questions from the members.*

**This matter was Presented**

## Discussion and Possible Action

### 11. Proposed Motion No. 2025-0346

A MOTION relating to the King County Metro Transit Strategic Plan for Public Transportation 2021-2031 and King County Metro Transit Service Guidelines and accepting the King County Metro Transit 2025 System Evaluation.

**Sponsors:** Barón

*Mary Bourguignon, Council staff, briefed the Committee on the legislation and answered questions from the members. Corey Holder, Transportation Planner, Metro Transit Department and Chris O'Claire, Mobility Division Director, King County, commented and answered questions from the members.*

*This item was expedited to January 27, 2026 Full Council meeting.*

**A motion was made by Councilmember von Reichbauer that this Motion be Recommended Do Pass Consent. The motion carried by the following vote:**

**Yes:** 4 - Balducci, Dunn, Fain and von Reichbauer

## Briefing

### 12. Briefing No. 2026-B0011

Expediting RapidRide Report

*Pierce Canser, Supervisor, System Expansion and Integration, Metro, Jennifer Knauer, Capital Delivery Section Manager, and Jerry Roberson, Special Projects Manager, Metro Transit Department, briefed the Committee via PowerPoint Presentation and*

*answered questions from the members.*

**This matter was Presented**

**13. Briefing No. 2026-B0014**

Vanpool Update Report

*Jason Halvorson, Mobility Services Supervisor, Metro, briefed the Committee via PowerPoint presentation and answered questions from the members.*

**This matter was Presented**

**Other Business**

*There was no other business to come before the Committee.*

**Adjournment**

*The meeting was adjourned at 11:42 a.m*

Approved this \_\_\_\_\_ day of \_\_\_\_\_

\_\_\_\_\_  
Clerk's Signature

## Organics System Mapping and Policy Report

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November 2025



**King County**

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## II. Proviso Text

Ordinance 19861, Section 109 Solid Waste, Department of Natural Resources and Parks, Proviso P2<sup>1</sup>

P2 PROVIDED THAT:

Of this appropriation, \$500,000 shall not be expended or encumbered until the executive transmits an organics system mapping and policy report and a motion that should acknowledge receipt of the organics system mapping and policy report, and a motion acknowledging receipt of the organics system mapping and policy report is passed by the council. The motion should reference the subject matter, the proviso's ordinance, ordinance section, and proviso number in both the title and body of the motion.

To further the council's understanding, in support of the county's zero waste goal, the organics system mapping and policy report should include information regarding the flow of organic materials in the county's regional solid waste system, identification of regulatory and compliance gaps in the system, and recommended policy and program changes to make further progress toward the zero waste and other solid waste system goals.

The organics system mapping and policy report shall include, but not be limited to:

A. A comprehensive analysis that maps or otherwise depicts or describes the various ways organic materials flow through the county's solid waste system. The analysis shall:

1. Identify the different types of generators of organic materials that exist in the system and the applicable regulations regarding collection and management of organics for each generator type. This part of the analysis shall include all relevant federal, state, county, and city regulations concerning organics collection and management and take into account the city-by-city differences in collection contracts and city codes. The party responsible for enforcement of each regulation shall also be identified;

2. List all known entities that provide collection or management services for organic materials generated in the county's regional solid waste system. For each entity or type of entity, the report shall also identify all applicable federal, state, county, and city regulations regarding the collection or management of organics, as well as the regulations that pertain to flow control and in support of diversion of organics to other uses besides landfilling. The regulations may include, but are not limited to, source separation of organics, quality assurance standards for organic materials contained in city contracts or city codes, and minimization of contamination. The entities providing collection or management entities may include, but are not limited to, composting facilities, anaerobic digestion facilities, haulers, and self-haulers.

3. Identify the party responsible for enforcement of each regulation identified in subsection 2 shall include any known performance data for each entity that illustrates the solid waste system's success at diverting organics from being landfilled, such as the facility's residual rate, which refers to the proportion of materials that is disposed due to contamination or other reasons;

4. Identify any areas in the system where significant leakage of organic materials may be occurring. For the purposes of this proviso, "leakage" refers to organic materials not being managed in accordance with existing applicable regulations, either by intention or accident. For example, if a city contract directs all organic materials collected within its jurisdiction to a designated facility, leakage in this example could be organic materials that are taken to a

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<sup>1</sup> Ordinance 19861 [\[LINK\]](#)

different facility. That section of the analysis shall also include the potential ways in which the applicable regulatory entities would know or find out about possible instances of leakage.

5. Include an evaluation that identifies potential regulatory and compliance gaps at the federal, state, county, and city levels that are potentially hindering the county's efforts on zero waste. This portion of the analysis shall also include the generator types, or subtypes as appropriate, where significant noncompliance may exist; and

6. Identify where any information requested in subsection A.1. through 5. of this proviso are not available, along with the reason or reasons why it is unavailable;

B. A review of the best practices in the flow control of and management of organic materials as they pertain to zero waste efforts. The review of best practices shall include the consultation of, or review of materials produced by the United States Composting Council, the Washington Organics Recycling Council, at least one organics processor located in King County, and relevant environmental nonprofits with recommendations on source separation policies; and

C. Recommended actions and policies the county could take to improve the flow control of organic materials, the diversion of organics from landfilling, and otherwise make progress towards the county's zero waste goal as relates to organic materials.

The executive should electronically file the organics system mapping and policy report by December 15, 2025, with the clerk of the council, who shall retain an electronic copy and provide an electronic copy to all councilmembers, the council chief of staff, and the lead staff for the transportation, economy, and environment committee or its successor.

### III. Executive Summary

In response to a proviso included in Ordinance 19861, the King County Solid Waste Division (SWD) contracted with Cascadia Consulting Group, LLC, to produce a flow control analysis for organic materials in the County's regional solid waste system. Organic materials include yard waste, food waste, and other organic materials, such as paper products.

In this context, "flow control" refers to the methods used by governmental entities to control the disposition of waste generated within their jurisdictions. The analysis included in this report covers policies, ordinances, regulations, contracts, and agreements pertaining to flow control of organics.

The three types of generators of organic materials are single-family residents, multifamily residents, and commercial entities. In a waste characterization study conducted by King County in 2022, the majority of inbound organics, 86 percent, were from residential curbside collection.<sup>2</sup>

#### Federal, State, County, and City Regulations Pertaining to Organics

**Federal:** While several federal regulations set requirements relating to organics management, most requirements are set at the state and local levels. The Resource Conservation and Recovery Act is the federal law that most directly covers solid waste management.<sup>3</sup> The act provides guidelines for states

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<sup>2</sup> 2022 King County Waste Characterization and Customer Survey Report [\[LINK\]](#)

<sup>3</sup> Resource Conservation and Recovery Act [\[LINK\]](#)

developing comprehensive solid waste management plans to identify strategies for managing solid waste and conserving resources.

**State:** Under Washington State’s Organics Recycling Collection Area (ORCA) requirements, jurisdictions (with some exemptions) must provide organic waste collection service to all single-family residents.<sup>4</sup> By April 1, 2030, (1) the collection service must include food waste and (2) all single-family residents must use this source-separated organic waste collection service. Beginning on April 1, 2027, state law will require that jurisdictions provide year-round, source-separated organic solid waste collection services for all single-family residents and nonresidential customers that generate more than 0.25 cubic yards of organic waste per week.

For multifamily residences, jurisdictions submitting a draft solid waste management plan after July 1, 2026, must include programs and a timeline to require the collection of source-separated organic waste from multifamily residents. For both single-family and multifamily residences, the law prohibits jurisdictions from imposing penalties on an individual for the improper disposal of organic waste in a noncommercial or residential setting.

Applicable to commercial generators, Washington’s Business Organic Management Area (BOMA) requirements state that businesses must sign up for and use organics collection services or manage their organic waste by other methods.

**County:** The King County Code (KCC) Chapter 10.18 requires that jurisdictions provide yard waste collection services for single-family residents and multifamily properties in the County’s unincorporated service areas.<sup>5</sup> Participation is not required, but yard waste cannot be put in single-family garbage carts, so single-family residents can either subscribe to organics service, compost yard waste on site, or self-haul yard waste to a transfer station. There is no enforcement other than reporting requirements for haulers.

**City:** The North Bend, Pacific, and Shoreline city codes all require single-family residents and multifamily properties to pay for organic waste collection services but do not require use of service.<sup>6</sup> Algona, Bothell, and Snoqualmie require single-family residents and multifamily properties to use organic waste collection services.<sup>7</sup> The City of Burien requires only food service establishments to use organic waste collection services.<sup>8</sup>

### Collection and Management Services and Associated Regulations

County residents and businesses can discard their organic waste in two ways: 1) set out all organic material for pick-up through a curbside collection program or 2) self-haul yard waste and clean wood to one of the six County-owned transfer facilities that accepts these materials.

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<sup>4</sup> Registered Code of Washington (RCW) 70A.205.540 [\[LINK\]](#)

<sup>5</sup> King County Solid Waste Code, Chapter 10.18 [\[LINK\]](#)

<sup>6</sup> North Bend City Code 8.12 [\[LINK\]](#); Pacific City Code 14.02 [\[LINK\]](#); Shoreline City Code 13.14 [\[LINK\]](#)

<sup>7</sup> Algona City Code 8.04 [\[LINK\]](#); Bothell Municipal Code 8.2 [\[LINK\]](#); Snoqualmie City Code 8.12 [\[LINK\]](#)

<sup>8</sup> Burien City Code 8.15 [\[LINK\]](#)

Residential curbside collection programs vary throughout the county by cost structure, hauler type, and service level. Three commercial haulers — Recology, Waste Management, and Republic Services — collect the majority of residential curbside organic waste, either through direct contract with a municipality or through a permit administered by the Washington Utilities and Transportation Commission.

Nonresidential organic waste is collected by the three primary residential haulers, as well as Divert and Cedar Grove Composting. In general, nonresidential curbside collection follows the same format as residential collection programs.

After collection, commercial haulers deliver both residential and nonresidential curbside-collected organics to various composting facilities in the county and region. During processing, waste material is sorted and separated. Non-compostable materials, called “residuals” are hauled to the County’s Cedar Hills Regional Landfill for disposal.

### State Processing and End Market Regulation

Standards for composting facilities under RCW 173.350.220 include permit requirements, design, operating procedures, and closure plans.<sup>9</sup> They apply to facilities that process organic materials through composting, including those that may distribute composted material off site.

### Compost Procurement

Under RCW 43.19A.150, certain cities and counties are required to adopt compost procurement ordinances.<sup>10</sup> Cities and counties must plan to use compost for landscaping, construction and post-construction soil amendments, erosion and stormwater runoff mitigation, vegetation growth, roadway management, and green infrastructure.

King County compliance. In 2022, King County added a new chapter to KCC Title 18 that includes a compost procurement ordinance.<sup>11</sup> The ordinance requires that certain County projects use compost and sets up regular reporting of compost use to Ecology.

In 2022, King County published the Re+ Strategic Plan, outlining strategies to minimize the amount of recoverable waste, including organics waste, that ends up in the landfill.<sup>12</sup> Strategies include grants for King County cities to implement zero-waste solutions for target materials, such as food and yard waste; technical support to businesses on food waste diversion and management, and engaging community members to increase access to waste diversion in multifamily buildings.

### Leakage of Organic Materials

“Leakage” refers to organic materials not being managed in accordance with regulations, either by intention or accident. Two identified sources of leakage are:

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<sup>9</sup>RCW 173.350.220 [\[LINK\]](#)

<sup>10</sup> RCW 43.19A.150 [\[LINK\]](#)

<sup>11</sup> KCC Chapter 18.30 [\[LINK\]](#)

<sup>12</sup> King County Solid Waste Division Re+ Strategic Plan [\[LINK\]](#)

- Generators may be discarding their organic materials into garbage or recycling bins, and thus they are lost in the garbage or recycling stream.
- Haulers may send collected organic materials to unknown organic materials management facilities. While these organic materials may be processed through organic materials management means, they are considered a leakage.

King County conducted a year-long waste characterization study in 2022 that helped identify the amount of compostable organics being disposed (thrown out as garbage) by generators.<sup>13</sup> Overall, compostable materials accounted for 26 percent of the commercially collected waste disposed in King County in 2022.

### Potential Regulatory and Compliance Gaps

**State level:** The law does not include any enforcement mechanism to ensure that jurisdictions provide organic collection services to all single-family residents. Moreover, the law prohibits jurisdictions from imposing penalties on an individual for improper disposal in a noncommercial or residential setting.

The requirements for commercial generators include some enforcement methods, but do not provide detail regarding an enforcement schedule nor how the enforcement entities will determine when a commercial generator is not in compliance.

**County level:** The King County Solid Waste Code does not describe any enforcement methods to ensure yard waste collection services are provided for all single-family and multifamily residents in the county's unincorporated areas. The law does not mandate participation from single-family and multifamily residents.

**City level:** Of the 37 cities in King County that were evaluated, 16 have mandatory service-level requirements for garbage service, but only seven require that residents subscribe to organics collection services. Of these seven, only three require properties to use these services.

### Best Practices

Recommendations regarding best practices have been identified by Zero Waste Washington, and encapsulate national, state, and regionally applicable approaches.<sup>14</sup> They include:

- Ensure high-quality feedstock for the organic materials management industry and incorporate appropriate backstops as part of policy development.
- Require municipalities to include partner educational and outreach programs in their contracts with service providers and other collaborators to reduce contamination.
- Regionally standardize local government contracting processes with organic materials management facilities.
- Encourage municipalities to pilot pay-as-you-throw collection systems based on weight instead of volume for commercial collection.

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<sup>13</sup> 2022 King County Waste Characterization and Customer Survey Report [\[LINK\]](#)

<sup>14</sup> Zero Waste Washington. Improving Organic Materials Management in Washington State. [\[LINK\]](#)

### Information Requested but Not Available

Some information requested in the proviso is not available because it does not currently exist, for example where regulations are silent regarding enforcement. One significant item that likely exists but is not available is information on the residual rate for organics from Cedar Grove, King County's main organic processing facility, which takes most of the County's organic materials.

### Recommendations

It should be noted that any changes in Code provisions or policy would be vetted in collaboration with the County's interlocal agreement partners, the Metropolitan Solid Waste Advisory Committee, and the Solid Waste Advisory Committee prior to the submittal of any proposed policy to the Executive and County Council for approval.

#### *Update Definitions and Reporting*

Clarify what constitutes organics, residuals, and recyclable materials, and require haulers and facilities to provide detailed data on tonnages and contamination.

#### *Prevent Leakage*

Prevent actions that lead to organics being mismanaged or residuals bypassing the County's flow control framework; this includes generators placing organics in a garbage or recycling bin, or haulers sending organic waste to be processed outside King County.

#### *Ensure Fair Cost Recovery*

Explore the potential for requiring facilities that dispose of residuals outside King County to remit to King County the difference in tipping fees, thus maintaining their operational flexibility while ensuring fairness.

The report includes recommendations for changes to KCC Title 10 that would facilitate the improvements listed above.

### Conclusion/Next Steps

More steady progress is needed toward the County's zero waste goal. New policies and strategies to properly manage recoverable waste, including organics, as well as accountability among all interested parties are needed.

Through potential changes in Code definitions, reporting requirements, and enforcement, and in collaboration with partner cities and other interested parties, King County has the opportunity to significantly improve flow control and recovery of organics.

## IV. Background

**Department Overview:** The King County Department of Natural Resources and Parks (DNRP) works in support of sustainable and livable communities and a clean and healthy natural environment. Its mission is to foster environmental stewardship and strengthen communities by providing regional parks,

protecting the region's water, air, land, and natural habitats, and reducing, safely disposing of, and creating resources from wastewater and solid waste.<sup>15</sup>

The Solid Waste Division (SWD) of DNRP provides garbage transfer and disposal as well as recycling services for approximately 1.3 million residents and 660,000 employees in King County. The King County solid waste system serves a large unincorporated area and 37 of the 39 cities in King County.<sup>16</sup>

**Key Historical Conditions:** King County's Zero Waste of Resources goal is to reduce, reuse, and prevent waste wherever possible, and to divert recyclable materials away from the landfill.

Food and yard waste have significant environmental and economic value when properly processed. A significant amount of food that ends up in the landfill is edible and could have been redistributed to people facing food insecurity. Moreover, as garbage, this wasted food has the potential to emit 60,400 metric tons of carbon dioxide equivalent (MTCO<sub>2</sub>e) into the atmosphere, further contributing to climate change.

**Key Current Conditions:** Up to 70 percent of the materials sent to the County's Cedar Hills Regional Landfill (CHRLF) are recyclable, and about 30 percent of those materials consist of food and yard waste (organics).<sup>17</sup>

Preventing 75 percent of that recyclable material from entering the waste stream would divert 450,000 tons from the landfill and eliminate approximately 600,000 metric tons of greenhouse gas emissions annually.<sup>18</sup> This would also reduce the need for natural resources to create new products. The federal Environmental Protection Agency calculates that diverting 450,000 tons of waste to recycling facilities could also add 500 green jobs to the regional economy.<sup>19</sup>

Without intervention, waste and its associated greenhouse gas emissions will increase as the county's population grows, and the CHRLF will be full by 2040. SWD's Re+ program is designed to address these issues.

As part of its Waste Monitoring Program, King County conducted a year-long waste characterization study and customer survey in 2022.<sup>20</sup> The results of this study can be used to understand how much compostable organic material is being thrown away as garbage in King County.

Overall, compostable materials accounted for 26 percent of the commercially collected waste that ended up in the landfill in King County in 2022. Recoverable compost — material that would be compostable if it were recovered from the total waste disposed — included 18 percent food waste, of

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<sup>15</sup> Department of Natural Resources and Parks [\[LINK\]](#)

<sup>16</sup> About the Solid Waste Division [\[LINK\]](#)

<sup>17</sup> 2022 King County Waste Characterization and Customer Survey Report [\[LINK\]](#)

<sup>18</sup> King County Waste Monitoring Program, 2019 Waste Characterization Study [\[LINK\]](#)

<sup>19</sup> King County Solid Waste Division Re+ Strategic Plan [\[LINK\]](#) (original EPA reference no longer available)

<sup>20</sup> 2022 King County Waste Characterization and Customer Survey Report [\[LINK\]](#)

which 69 percent was potentially edible; thus, 12 percent of overall waste was potentially edible food waste.<sup>21</sup>

Compostable materials accounted for 35 percent of commercially collected residential waste generators. Food waste accounted for 25 percent of that, with 17 percent identified as potentially edible.

Compostable material accounted for 6 percent of self-haul waste, with food waste accounting for 1 percent of self-haul waste, 80 percent, of which was identified as potentially edible.

**Report Methodology:** SWD contracted with Cascadia Consulting Group, LLC (Cascadia), to produce a flow control analysis for organic materials in the County's regional solid waste system. Organic materials include yard waste, food waste, and other organic materials, such as paper products.

In this context, "flow control" refers to the methods used by governmental entities to control the disposition of waste generated within their jurisdictions. The analysis included in this report covers policies, ordinances, regulations, contracts, and agreements pertaining to flow control of organics.

In addition to research on these topics, Cascadia reviewed the city codes and hauling contracts of the 37 cities in the King County solid waste system for information regarding enforcement of city codes related to organics. They also reviewed best practices shared by the US Composting Council, Washington Organics Recycling Council, and Zero Waste Washington.<sup>22,23,24</sup>

## V. Report Requirements

This report is organized to align with the requirements of the proviso.

### A. A comprehensive analysis that maps or otherwise depicts or describes the various ways organic materials flow through the county's solid waste system.

#### A.1. Types of generators of organic materials and applicable regulations

The three types of generators of organic materials are single-family residents, multifamily residents, and commercial entities. Organics waste generators in the commercial sector include food and beverage manufacturing companies, grocers and food retailers, restaurants, food shelters, universities, farms, gardening and landscaping companies, airports, and hotels.

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<sup>21</sup> To further break down these data between commercially collected nonresidential and residential generators: (1) For commercially collected nonresidential waste generators, compostable materials accounted for 29 percent of waste, with food waste accounting for 19 percent, and 14 percent identified as potentially edible. (2) For commercially collected residential waste, compostable materials accounted for 35 percent, food waste accounted for 25 percent, and 17 percent was identified as potentially edible.

<sup>22</sup> US Composting Council [[LINK](#)]

<sup>23</sup> Washington Organics Recycling Council [[LINK](#)]

<sup>24</sup> Zero Waste Washington [[LINK](#)]

As reported in the 2022 King County Organics Characterization Report, the majority of inbound organics (86 percent) came from residential curbside collection, 3 percent came from nonresidential sources, and 11 percent was self-hauled to County-owned transfer stations for recovery. Of the overall organic waste, 94 percent was acceptable compostable material, while 6 percent was comprised of residuals, or the waste materials (e.g., garbage) left over after compostable materials have been processed.

Generally, organics management is covered under state and local regulations. The federal law that most directly covers solid waste management is the Resource Conservation and Recovery Act (RCRA).<sup>25</sup> The act provides guidelines for states developing comprehensive solid waste management plans to identify strategies for managing solid waste and conserving resources. The organics waste management requirements set by Washington State, King County, and the cities within King County do not violate any requirements set by these federal regulations, and thus are effectively the enforcement mechanisms for federal law. Enforcement is discussed in more detail in Section A.3.

State, county, and city regulations applicable to the three types of generators are outlined below.

### **Washington State Organics Recycling Collection Area (ORCA) Requirements<sup>26</sup>**

#### *Single-family residences*

Under the ORCA requirements, jurisdictions must provide organic waste collection service to all single-family residents. Some jurisdictions and unincorporated areas are exempt based on factors, such as population size, annual solid waste generation amounts, and Urban Growth Area designations.

ORCA requirements also direct that by April 1, 2030:

- the collection service must include food waste
- all single-family residents must use this source-separated organic waste collection service

#### *Multifamily residences*

Effective July 27, 2025, jurisdictions submitting a draft solid waste management plan after July 1, 2026, must include programs and a timeline to require the collection of source-separated organic waste from multifamily residents. Initially, the requirements will apply to newly constructed or substantially remodeled multifamily residential buildings.

### **Washington State Business Organic Management Area (BOMA) Requirements<sup>27</sup>**

#### *Commercial generators*

This law requires businesses to sign up for and utilize organics collection services, manage their organic waste on site, self-haul for organics material management, or sell or donate their food or fiber waste to another business. This requirement will increase the number of businesses that must comply by lowering the weekly organic waste generation threshold.

Jurisdictions or areas within a jurisdiction can be exempted if they can prove that they do not have the collection and processing capacity. An amendment that took effect July 27, 2025 requires the

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<sup>25</sup> Resource Conservation and Recovery Act [\[LINK\]](#)

<sup>26</sup> Registered Code of Washington (RCW) 70A.205.540 [\[LINK\]](#)

<sup>27</sup> RCW 70A.205.545 [\[LINK\]](#)

Washington Department of Ecology (Ecology) to publish an inexhaustive list of businesses that would likely be required to manage organic materials according to this law.

### **King County Solid Waste Code**

#### *Single-family and multifamily residences*

The King County Code (KCC) Chapter 10.18 requires that jurisdictions provide yard waste collection services for single-family residents and multifamily properties in the county's unincorporated service areas.<sup>28</sup> Participation is not required, but yard waste cannot be put in single-family garbage carts, so single-family residents can either subscribe to organics service, compost yard waste on site, or self-haul yard waste to a transfer station.

If deemed feasible by the Director of SWD, certificated haulers can also collect food waste and soiled paper.

### **North Bend, Pacific, and Shoreline City Codes**

These cities all require single-family residents and multifamily properties to pay for organic waste collection services but do not require use of service.<sup>29</sup>

### **Algona, Bothell, and Snoqualmie City Codes**

These cities require single-family residents and multifamily properties to use organic waste collection services.<sup>30</sup>

### **Burien City Code**

The City of Burien requires only food service establishments to use organic waste collection services.<sup>31</sup>

## **A.2. Entities that provide collection or management services for organic materials generated in the county's regional solid waste system and applicable regulations, including those pertaining to flow control**

### **Collection and Management Services**

County residents and businesses can discard their organic waste in two ways: 1) set out all organic material for pick-up through a curbside collection program or 2) self-haul yard waste and clean wood to one of the six County-owned transfer facilities that accepts these materials.

The County facilities with yard waste and clean wood collection programs are the Bow Lake, Enumclaw, Factoria, Shoreline, and Vashon recycling and transfer stations and the Cedar Falls Drop Box. The Vashon Recycling and Transfer Station also accepts food waste since there is no curbside organics collection service available on Vashon Island.

Residential curbside collection programs vary throughout the county by cost structure, hauler type, and service level. In some jurisdictions, curbside service is provided automatically with garbage collection

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<sup>28</sup> King County Solid Waste Code, Chapter 10.18 [\[LINK\]](#)

<sup>29</sup> North Bend City Code 8.12 [\[LINK\]](#); Pacific City Code 14.02 [\[LINK\]](#); Shoreline City Code 13.14 [\[LINK\]](#)

<sup>30</sup> Algona City Code 8.04 [\[LINK\]](#); Bothell Municipal Code 8.2 [\[LINK\]](#); Snoqualmie City Code 8.12 [\[LINK\]](#)

<sup>31</sup> Burien City Code 8.15 [\[LINK\]](#)

and an organics cart is supplied by default with no additional cost (embedded service). In other jurisdictions, customers need to request an organics cart and collection service at additional cost (subscription service).

Three commercial haulers — Recology, Waste Management, and Republic Services — collect the majority of residential curbside organic waste, either through direct contract with a municipality or through a permit administered by the Washington Utilities and Transportation Commission. The City of Enumclaw and the Town of Skykomish each manage their own organics collections and do not use a commercial hauler. Some cities do not address organics collection management in their codes. Appendix A provides a summary of current city regulations and contracts.

Nonresidential organic waste is collected by the three primary residential haulers, as well as Divert and Cedar Grove Composting. In general, nonresidential curbside collection follows the same format as residential collection programs. The main differences are in how businesses contract with haulers and how tons of organic waste are reported to the County. The majority of jurisdictions allow open markets for nonresidential organics collection, meaning that businesses may contract directly with commercial haulers instead of joining a municipality-wide program. King County does not require these open-market haulers to report how many tons of organics they collect from nonresidential sources. Reporting is only required for organics collected from small nonresidential entities covered under a franchise agreement between a city and a hauler.

After collection, commercial haulers deliver both residential and nonresidential curbside-collected organics to the Cedar Grove Composting facilities in Maple Valley and Everett, the Lenz Enterprises processing facility in Stanwood, and other smaller-scale composting entities throughout the county.

Cities contracting with Recology and Republic have their residential organics hauled to Cedar Grove. Waste Management hauls to Cedar Grove, North Mason Fiber, Lenz, and DTG for organics processing. Residents who haul their own organics generally take them to the transfer stations that have organics service or to Cedar Grove. County-owned trucks also haul organics collected at transfer stations and the Cedar Falls Drop Box to these facilities.

During processing, waste material is sorted and separated. Preprocessing collected organics for composting may include removing waste contained in plastic bags, removing ferrous metals using magnets, and grinding and mixing collected waste to optimize the composting process. At Cedar Grove facilities, compost also undergoes a final screening at the end of the composting process to remove plastics or other inorganic contaminants. This material makes up the “residuals” stream and is hauled to the County’s CHRLF for disposal.

Residuals are separated after organics from multiple jurisdictions are combined. Therefore, residuals could include material collected from outside King County. Most accepted material is converted to compost, mulch, and other landscaping material using aerated static piles, while a small amount is transformed into biogas through anaerobic digestion.

Seattle's contract with Lenz requires that the city, at no cost to Lenz, pick up and dispose of contaminants sorted from material delivered under the city's contract. There is no information available regarding where Lenz (Snohomish County), DTG (Kitsap County), and North Mason Fiber (Mason County)

dispose of residuals, but it is unlikely that they transport residuals back to King County without a contract similar to Lenz’s, a financial incentive, or enforced requirements.

## Federal Regulations

While several federal regulations set requirements relating to organics management, most requirements are set at the state and local levels. As previously mentioned, RCRA is the federal law that most directly covers solid waste management. The act provides guidelines for states developing comprehensive solid waste management plans to identify strategies for managing solid waste and conserving resources.

Federal regulations relating specifically to food waste include:

- The Food Donation Improvement Act, which provides civil and criminal liability protection to food donors and donated food recipient organizations.<sup>32</sup>
- Protecting Americans from Tax Hikes (PATH) Act, which provides tax incentives to businesses for donating food.<sup>33</sup>
- The Organic Foods Production Act, which regulates organic crop production. The act allows compost feedstocks, such as newspapers or other recycled paper without glossy or colored ink, to be used in organic crop production. It also authorizes each state to establish their own program to regulate the production and handling of organic agricultural products within each state.<sup>34</sup>
- A combination of federal animal feed policies (Swine Health Protection Act, U.S. Food and Drug Administration Bovine Spongiform Encephalopathy/Ruminant Feed Ban Rule, the Food Safety Modernization Act) regulates the use of food scraps in animal feed to reduce disease outbreaks.<sup>35, 36, 37</sup>

Notably, organics waste management requirements set by Washington State, King County, and the cities within King County do not violate any requirements set by these federal regulations.

## State Regulations

### *Planning Regulations*

Washington state law requires counties to prepare comprehensive solid waste management plans that include strategies for the source separation of organic waste by generators, collection and processing of source-separated organic waste for organic materials management, and organic waste reduction.<sup>38</sup> As part of this requirement, each county must determine the volumetric capacity of its organic materials management facility needed to manage the county’s generated organic waste and identify the priority

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<sup>32</sup> Food Donation Improvement Act [\[LINK\]](#)

<sup>33</sup> Protecting Americans from Tax Hikes [\[LINK\]](#)

<sup>34</sup> Organic Foods Production Act [\[LINK\]](#)

<sup>35</sup> Swine Health Protection Act [\[LINK\]](#)

<sup>36</sup> Bovine Spongiform Encephalopathy/Ruminant Feed Ban Rule [\[LINK\]](#)

<sup>37</sup> Food Safety Modernization Act [\[LINK\]](#)

<sup>38</sup> RCW 70A.205.040 [\[LINK\]](#)

areas for the establishment of organic materials management facilities. Cities within each county must either: 1) deliver their own plans for the county to integrate into its comprehensive plan, 2) enter into an agreement with the county to prepare a joint city-county plan, or 3) authorize the county to prepare a plan for the city.

### *Flow-Control Regulations*

#### **Collection**

ORCA requirements. Beginning on April 1, 2027, state law will require that jurisdictions provide year-round, source-separated organic solid waste collection services for all single-family residents and nonresidential customers that generate more than 0.25 cubic yards of organic waste per week.<sup>39</sup> All collected organic waste must be processed by composting, anaerobic digestion, vermiculture, black soldier fly, or similar technologies.<sup>40</sup>

Jurisdictions submitting a draft solid waste management plan after July 1, 2026, must include programs and a timeline to require the collection of source-separated organic waste from multifamily residents. Initially, the requirement will apply to newly constructed or substantially remodeled multifamily residential buildings. Other multifamily buildings may receive a waiver, if the jurisdiction determines that the building does not have adequate storage capacity or the option of sharing containers with an adjacent multifamily building or business.

Additional requirements for single-family and nonresidential customers will come into effect on April 1, 2030. Jurisdictions not already accepting food waste as part of their organic solid waste collection services must collect food waste, either source-separated or comingled with other organic materials. Jurisdictions must also provide the services on a nonelective basis to customers that receive other curbside solid waste collection services, unless the customer manages their organic waste on site or self-hauls their organic waste for organic materials management. All single-family and nonresidential customers must use this source-separated organic waste collection service if disposing of their organic waste through curbside collection.

The requirements in this law do not apply to jurisdictions with population sizes or annual solid waste generation amounts under the specified thresholds. Unincorporated areas within King County are exempt if they are:

- Outside of the urban growth areas that King County identified in compliance with the Growth Management Act (RCW 36.70A.110)<sup>41</sup>
- Inside urban growth areas and provide source-separated organic waste collection service to either all single-family residents or nonresidential customers that generate more than 0.25 cubic yards of organic waste per week, or

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<sup>39</sup> RCW 70A.205.040 [\[LINK\]](#)

<sup>40</sup> Anaerobic digestion is a process through which bacteria break down organic matter, such as animal manure, wastewater biosolids, and food wastes, in the absence of oxygen. Vermiculture uses earthworms to decompose organic waste into nutrient-rich fertilizer called “castings.” Black soldier fly larvae are among the most efficient organisms at converting biomass into feed and are used in composting.

<sup>41</sup> Urban growth area [\[LINK\]](#) Note: this map excludes part of east King County but most clearly shows the Urban Growth Area boundaries.

- Inside urban growth areas with an unincorporated population of fewer than 25,000 residents.

BOMA requirements. Certain businesses are required to sign up for and use organics collection services, manage their organic waste on site, self-haul the waste for organics material management, or sell or donate their food or fiber waste to another business. Since 2024, Washington State has been expanding the number of businesses that would need to meet this requirement in a phased approach.

- In 2024, the requirement applied to businesses generating at least eight cubic yards of organic waste per week.
- In 2025, the requirement applies to businesses generating at least four cubic yards per week.
- In 2026, it will apply to businesses generating at least 96 gallons per week.

Certain types of organic waste, such as donated food or organic waste managed on site, are not counted toward the minimum weekly generation thresholds. In addition, the law does not apply to businesses in jurisdictions or areas within a jurisdiction that do not have organics waste collection and processing capacity.<sup>42</sup> Cities and counties will be responsible for providing documentation showing lack of capacity. Ecology will confirm whether to exempt businesses within a jurisdiction or an area within a jurisdiction and will make the full list of exempt jurisdictions or areas available on its website.

On July 27, 2025, an amendment took effect that requires Ecology to publish an inexhaustive list of businesses that would likely be required to manage organic materials according to the BOMA requirements and share its methodology for deciding which businesses are included. Ecology is authorized to request information for the list from solid waste collection companies.

### Processing

Standards for composting facilities under RCW 173.350.220 include permit requirements, design, operating procedures, and closure plans.<sup>43</sup> They apply to facilities that process organic materials through composting, including those that may distribute composted material off site.

Facilities may be exempted from certain permitting requirements if they meet other requirements, such as:

- submitting a notice of intent to the jurisdictional health department that the facility intends to operate as a conditionally exempt facility
- conducting compost analysis, and
- providing reports and results of composted material analysis to Ecology and the jurisdictional health department.

### End Market Regulation

#### Compost Procurement

Under RCW 43.19A.150, certain cities and counties are required to adopt compost procurement ordinances.<sup>44</sup> Cities and counties must plan to use compost for landscaping, construction and post-

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<sup>42</sup> Business Organics Management Areas (BOMA) are published on Ecology's website [[LINK](#)]

<sup>43</sup> WAC 173-350-220 [[LINK](#)]

<sup>44</sup> RCW 43.19A.150 [[LINK](#)]

construction soil amendments, erosion and stormwater runoff mitigation, vegetation growth, roadway management, and green infrastructure.

King County compliance. In 2022, King County added a new chapter to KCC Title 18 that includes a compost procurement ordinance.<sup>45</sup> The ordinance requires that certain County projects use compost and sets up regular reporting of compost use to Ecology.

#### Voluntary Reporting for Donated Food

Under RCW 70A.205.550, Ecology may set up a voluntary reporting protocol to receive data from businesses that donate food or from recipients of the donated food.<sup>46</sup> The data could include the volumes, types, and timing of food generated and donated by the business.

### County Regulations and Plans

#### *Solid Waste Code*

Title 10 of the KCC pertains to solid waste.<sup>47</sup> Chapter 10.08 establishes that SWD is the operating authority for all solid waste facilities that the County owns or operates.<sup>48</sup> This regulation also requires solid waste facilities in King County, including organics management facilities, to operate in accordance with King County's comprehensive solid waste management plan.<sup>49</sup> All entities that collect solid waste must submit a monthly report to SWD with the total residential and commercial tonnage hauled to each King County solid waste facility, as well as tonnage data separated by cities, towns, or unincorporated service areas. They must also submit an annual forecast for the estimated residential and commercial tonnage and number of residential and commercial accounts, in total and by the separate cities, towns, or unincorporated service areas.

Chapter 10.14 sets a countywide goal to achieve zero waste by 2030.<sup>50</sup> The regulation establishes a waste reduction and recycling grant program, from which grants could potentially be awarded to cities participating in the County's solid waste system for projects improving opportunities for curbside collection and recycling or organic materials. The regulation also requires the County to consider its waste reduction and recycling goals when determining the size of future recovery facilities.

Chapter 10.18 requires that yard waste collection services be available for both single-family and multifamily residents in the county's unincorporated service areas.<sup>51</sup> If deemed feasible by the Director of the King County SWD, certificated haulers can also collect food waste and soiled paper, but participation is not mandatory. The organics collection service could include yard waste, other organics, and food waste, including paper products that contain food residue.

In areas where organic collection is offered, the yard and other organic waste shall be collected weekly. Even in areas where organics collection is not offered regularly, certificated haulers must collect yard

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<sup>45</sup> KCC Chapter 18.30 [\[LINK\]](#)

<sup>46</sup> RCW 70A.205.550 [\[LINK\]](#)

<sup>47</sup> KCC Title 10 [\[LINK\]](#)

<sup>48</sup> KCC Chapter 10.08 [\[LINK\]](#)

<sup>49</sup> King County Comprehensive Solid Waste Management Plan [\[LINK\]](#)

<sup>50</sup> [KCC Chapter 10.14 \[LINK\]](#)

<sup>51</sup> [KCC Chapter 10.18 \[LINK\]](#)

waste from participating single-family and multifamily residents at least twice per month from March through November and once a month from December through February.

#### *King County Comprehensive Solid Waste Management Plan*

As discussed above in Section A.2, Washington state law requires counties to prepare comprehensive solid waste management plans. King County prepared and adopted its most current Comprehensive Solid Waste Management Plan in 2019. The plan establishes waste prevention and recycling goals and strategies for the next six to 20 years, including continually working toward the goal of zero waste.

#### *Re+ Strategic Plan*

In 2022, King County published the Re+ Strategic Plan, outlining strategies to minimize the amount of recoverable waste, including organics waste, that ends up in the landfill. Strategies related to organics waste management include:

- Optimizing collection services for food and yard waste collection for all single-family households in King County
- Providing grants for King County cities to implement zero-waste solutions for target materials, such as food and yard waste
- Providing technical support to businesses on food waste diversion and management
- Engaging community members to gain insights into how the County can help increase access to waste diversion and reduction opportunities in multifamily buildings

### **A.3. Party responsible for enforcement of each regulation identified in subsection 2 and any known performance data**

#### **Federal Enforcement**

The organics waste management requirements set by Washington State, King County, and the cities within King County are consistent with requirements set by federal regulations, and thus are effectively the enforcement mechanisms for federal law. There is no direct federal enforcement of laws pertaining to organics.

#### **State Enforcement**

##### *Planning Regulations*

Pertaining to the preparation of comprehensive solid waste management plans, the law does not mention any enforcement mechanisms. However, Ecology is authorized to review all county comprehensive solid waste management plans for approval.

##### *Flow-Control Regulations*

###### **Collection**

ORCA requirements. The law prohibits jurisdictions from imposing penalties on an individual for the improper disposal of organic waste in a non-commercial or residential setting. No language is provided regarding enforcement measures for noncompliant jurisdictions and businesses.

The law requires that Ecology adopt new rules or amend existing rules to require all organic materials management facilities to obtain a solid waste handling permit to address contamination with incoming food waste feedstocks and finished products.

BOMA requirements. This law authorizes jurisdictional health departments to enforce the requirements and stipulates that the health departments provide at least two written notices of noncompliance before issuing a penalty.<sup>52</sup> This enforcement authority also extends to a jurisdiction implementing an independent solid waste management plan.

The amendment grants the same enforcement authority to a jurisdiction implementing an independent solid waste management plan and further details the enforcement methods. A jurisdictional health department or jurisdiction implementing the plan must first send a notification letter to inform the noncompliant business of the requirements, followed by a notice of violation before issuing any civil penalties. Beginning July 1, 2026, businesses remaining in noncompliance after receiving the notification letter and notice of violation will be subject to minimum penalties ranging from \$500 to \$1,000 for each day of violation, depending on whether the business is on its first, second, or third violation. The total civil penalty for a small business will be capped at \$10,000 for a calendar year.

### Processing

Local health departments issue solid waste permits for composting facilities and are responsible for conducting inspections to ensure compliance with the regulations. Inspections occur at least annually for permitted facilities, as well as before issuing permits, permit renewals, or modifications.

Ecology plays a supporting role by setting the minimum functional standards for solid waste handling, including composting, in WAC 173-350.<sup>53</sup> The agency reviews permits issued by local health departments and can appeal decisions to the Pollution Control Hearings Board if it identifies issues of concern. Ecology also provides technical assistance and guidance to local governments.

If a composting facility is found to be operating in violation of WAC 173-350-220, the local health department has the authority to suspend or deny permits.<sup>54</sup> Violations can also lead to penalties. RCW 70.95 governs solid waste management, reduction, and recycling, and outlines potential penalties for violations.<sup>55</sup>

### End Market Regulation

#### Compost Procurement

Every year, cities and counties that adopt a compost procurement ordinance must report the total tons of organic waste diverted throughout the year, the facilities used for processing, the volume and cost of compost purchased throughout the year, and the sources of compost. The law does not identify any other enforcement methods.

### Voluntary Reporting for Donated Food

Reporting from businesses that donate food would be voluntary, so there is no enforcement mechanism for this law.

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<sup>52</sup> RCW.70A.205.545 [[LINK](#)]

<sup>53</sup> WAC 173-350 [[LINK](#)]

<sup>54</sup> WAC 173-350-220 [[LINK](#)]

<sup>55</sup> RCW 70.95 [[LINK](#)]

## County Enforcement

### *Solid Waste Code, Chapter 10.08*

The County's health officer enforces this regulation. Noncompliance would constitute a misdemeanor punishable by jail time.

### *Solid Waste Code, Chapter 10.14*

This regulation is focused on setting the County's waste reduction intentions, so it is focused on program evaluation rather than enforcement. The regulation states that the Council will evaluate the effectiveness of the waste reduction and recycling program based on an annual report from SWD on progress toward the goal of zero waste by 2030 and objectives set in the solid waste management plan.

### *Solid Waste Code, Chapter 10.18*

Certificated haulers must submit a monthly, quarterly, and annual report to SWD but there is no enforcement aside from reporting requirements.

The annual report is to include program highlights, a program evaluation component, and an annual tonnage forecast that estimates the total amount of solid waste tonnage for the current year. The quarterly report is to include collection service participation levels in the unincorporated service areas. The monthly report must include various metrics for customer participation levels and organic waste tonnage data. This tonnage data should summarize how much of the organic waste was sent to specific King County solid waste facilities. Certificated haulers must share with SWD the number of customers that received notification tags or whose solid waste containers were not collected because they contained yard waste.

## A.4. Areas in the system where significant leakage of organic materials may be occurring

"Leakage" refers to organic materials not being managed in accordance with existing applicable regulations, either by intention or accident. There are two identified sources of leakage, each discussed below, followed by results of a year-long waste characterization study that further describes leakage of organic materials.

### Generators Disposing of Organic Materials

Generators may be littering or discarding their organic materials into garbage or recycling bins, and thus they are lost in the garbage or recycling stream. In unincorporated King County, certificated haulers must submit monthly, quarterly, and annual reports to SWD that include collection service participation levels in the unincorporated service areas. They must also have available the number of customers who received notification tags or whose solid waste containers were not collected because they contained yard waste. The haulers must submit a monthly report with various metrics for customer participation levels and organics waste tonnage data.

Leakage of residuals (garbage or recyclable material) found in organic materials is also an issue, as it is not currently subject to King County's flow control policy. Due to this lack of regulatory authority, residue generated from King County organic material is often improperly processed (for example, processed outside of the county). Composting facilities are also not required to report data on residuals in their monthly reports. This prevents the County and cities from discovering leakage through reporting mechanisms.

## Organics System Mapping and Policy Report

Leakage of organic material from generators and haulers means that there is associated leakage of residuals. The residuals that are not transported back to King County also poses a loss in revenue.

### Haulers Sending Materials to Unknown Facilities

Haulers may send collected organic materials to unknown organic materials management facilities. While these organic materials may be processed through organic materials management means, they are considered a leakage.

In their monthly reports, certificated haulers for residential contracts in unincorporated King County must share their progress using various metrics for customer participation levels and organics waste tonnage data. These tonnage data should summarize how much of the organic waste is sent to an organic material processing facility.

Most of the city contracts require reporting of the tonnage of yard waste collected, and some contracts require the tonnage for each processing facility. Under their contracts, cities have the right to request scale tickets to verify that the tonnage received from composting facilities matched the tonnage data from the hauler's report. However, it is not known whether any cities are currently doing this.

### Leakage Identified through Waste Characterization

As part of the Waste Monitoring Program, King County conducted a year-long waste characterization study and customer survey in 2022. The results can be used to understand the amount of compostable organics being disposed by generators in King County.

The city contracts require source-separated compostables to be processed in a facility where the material is composted. During a procurement process, the hauler will state where it plans to drop materials for processing, but is allowed to change locations according to business needs. The amount of commercial organics garbage and recycling generated and leaked is not well known. Commercial contracts are open markets and haulers are not required to report the tons of materials collected from nonresidential generators.

Overall, compostable materials accounted for 26 percent of the commercially collected waste disposed in King County in 2022. Recoverable compost, which is material that would be compostable if it were recovered from the total waste disposed, included 18 percent food waste, of which 69 percent was potentially edible (12 percent of overall waste).

- Compostable materials accounted for 29 percent of waste from commercially collected *nonresidential* waste generators. Food waste accounted for 19 percent of commercially collected nonresidential waste, with 14 percent identified as potentially edible.
- Compostable materials accounted for 35 percent of commercially collected *residential* waste generators. Food waste accounted for 25 percent, with 17 percent identified as potentially edible.
- Compostable material accounted for 6 percent of self-haul waste. Food waste accounted for 1 percent of self-haul waste, of which 80 percent was identified as potentially edible.

## **A.5. Potential regulatory and compliance gaps at the federal, state, county, and city levels that are potentially hindering the county's efforts on zero waste.**

### **Potential State-Level Regulatory and Compliance Gaps**

#### *ORCA Requirements*

Generators falling under the ORCA requirements are single-family and multifamily residences. The law does not include any enforcement mechanism to ensure that jurisdictions provide organic collection services to all single-family residents. Moreover, the law prohibits jurisdictions from imposing penalties on an individual for improper disposal in a noncommercial or residential setting.

Because the requirement that all single-family residents participate does not take effect until April 1, 2030, there may be a significant number of single-family residents who are not participating before that date. The law does not include any method for enforcing this requirement.

As mentioned previously, effective July 27, 2025, jurisdictions submitting a draft solid waste management plan after July 1, 2026, must include programs and a timeline to require the collection of source-separated organic waste from multifamily residents. Initially, the requirements will apply to newly constructed or substantially remodeled multifamily residential buildings.

The law does not include any enforcement mechanism against jurisdictions that might not have the required programs and timelines in place.

#### *BOMA Requirements*

Applicable to commercial generators, this law includes some enforcement methods and the authorized enforcement parties but does not provide detail regarding an enforcement schedule nor how the enforcement entities will determine when a commercial generator is not in compliance. In addition, this requirement is only applicable to businesses in certain jurisdictions.

### **Potential County-Level Regulatory and Compliance Gaps**

The King County Solid Waste Code does not describe any enforcement methods to ensure yard waste collection services are provided for all single-family and multifamily residents in the county's unincorporated areas. The law does not mandate participation from single-family and multifamily residents.

### **Potential City-Level Regulatory and Compliance Gaps**

Of the 37 cities in King County that were evaluated, 16 have mandatory service-level requirements for garbage service, but only seven require that residents subscribe to organics collection services. Of these seven, only three require properties to use these services.

Enforcement is generally an area where many cities have an opportunity to develop more policies and procedures. Although it is not part of the King County solid waste system, the City of Seattle provides a good example of regulatory and enforcement gaps, even considering that it has the most detailed requirements. Seattle Public Utilities' policies regarding garbage containers contaminated with compostable (or recyclable) materials include the following:

- Seattle city ordinance notes that garbage bins must not contain more than 10 percent compostable and recyclable material.<sup>56</sup>
- A noncompliant container will be tagged as a warning and a notice mailed to the account. After two warnings, accounts may receive a \$50 fee on their waste bill for recyclables in the garbage.<sup>57</sup>

While the \$50 fee provides an enforcement mechanism, it is not documented in the city ordinance. This is similar to other cities, where there are mandates that compostables and recyclables be separated from garbage but no concurrent enforcement policies to fully implement the mandate.

#### **A.6. Information requested but not available**

Some information requested in the proviso is not available because it does not currently exist, such as where regulations are silent regarding enforcement.

One significant item that likely exists but is not available is information on the residual rate for organics from Cedar Grove, King County's main organic processing facility, which takes most of the county's organic materials. While there is information on organic tonnages sent to Cedar Grove, the residual rate by jurisdiction is not available.

#### **B. A review of the best practices in the flow control of and management of organic materials as they pertain to zero waste efforts**

The consultant reviewed best practices shared by the US Composting Council (USCC), Washington Organic Recycling Council (WORC), and Zero Waste Washington.<sup>58, 59, 60</sup> USCC and WORC best practices are focused largely on facility management and compliance with state regulations, e.g., feedstock blend ratios, contamination management related to feedstock quality, and stormwater runoff management requirements.<sup>61</sup> There were no materials on best practices available from a King County processing facility. Recommendations from the nonprofit Zero Waste Washington are listed below, as they provide similar but more detailed best practices and practices relevant to Washington.<sup>62</sup>

- Ensure high-quality feedstock for the organic materials management industry and incorporate appropriate backstops as part of policy development
- Require municipalities to include partner educational and outreach programs in their contracts with service providers and other collaborators to reduce contamination

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<sup>56</sup> Seattle Municipal Code Title III Chapter 21.36 [\[LINK\]](#)

<sup>57</sup> SPU, [Food Waste Requirements](#) [\[LINK\]](#)

<sup>58</sup> US Composting Council [\[LINK\]](#)

<sup>59</sup> Washington Organic Recycling Council [\[LINK\]](#)

<sup>60</sup> Zero Waste Washington [\[LINK\]](#)

<sup>61</sup> "Feedstock" is the organic material collected from generators and used as an input for a processing facility.

<sup>62</sup> Zero Waste Washington. Improving Organic Materials Management in Washington State. [\[LINK\]](#)

- Re-design permitting for composting facilities based on key performance indicator ranges in accordance with facility operation plans<sup>63</sup>
- Proactively define zoning for the development of organic materials management facilities
- Standardize the region’s local government contracting processes with organic materials management facilities
- Encourage municipalities to pilot pay-as-you-throw collection systems based on weight instead of volume for commercial collection

### **C. Recommended actions and policies to improve the flow control and diversion of organic materials and progress zero waste**

It is important to note that these are preliminary recommendations based on research and analysis. Pursuit or adoption of actions and policies would be based on engagement with the community and interested parties, feedback, and analysis, as well as equity impact review.

#### **Recommended Actions and Policies**

Stronger County policies for managing and tracking organic materials would ensure that organics are diverted from landfills. Current gaps in Code definitions and reporting create opportunities for leakage, where organics are not properly accounted for or managed.

It should be noted that any changes in Code provisions or policy would be vetted in collaboration with the County’s Interlocal Agreement partners, the Metropolitan Solid Waste Advisory Committee, and the Solid Waste Advisory Committee prior to submittal of any proposed policy to the Executive and County Council for approval.

Following are recommendations for improving the flow control of organic materials, advancing the County’s zero waste goal, and ensuring fairness and accountability.

#### *Update Definitions and Reporting*

Clarify what constitutes organics, residuals, and recyclable materials, and require haulers and facilities to provide detailed data on tonnages and contamination. Without clear authority over source-separated organics, the County cannot require accurate reporting or ensure proper handling of residuals.

#### *Prevent Leakage*

Prevent actions that lead to organics being mismanaged or residuals bypassing the County’s flow control framework; this includes generators placing organics in a garbage or recycling bin, or haulers sending organic waste to be processed outside King County.

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<sup>63</sup> State regulations establish general limits for retention times, temperature measurements, and lab results for finished compost, rather than operational conditions. Facilities’ operations plans provide detailed information about their throughput, retention times, location, and planned strategies and investments to capture and control emissions. These can be used to develop key performance indicator ranges for factors such as temperature, oxygen, pH, moisture content, and density. These parameters can be measured by staff and could ensure compliance of facility design parameters and environmental performance.

### *Ensure Fair Cost Recovery*

Explore the potential for requiring facilities that dispose of residuals outside King County to remit to King County the difference in tipping fees, thus maintaining their operational flexibility while ensuring fairness.

## **Proposed Amendments to King County Title 10**

### Section 10.04.020 Definitions<sup>64</sup>

#### 10.04.020 RR. "Garbage"

Issue: Current definition excludes source-separated organics, creating system leakage.

Recommendation: Remove exception (1) "*Organics that have been source separated for the purpose of recycling*" from the "garbage" definition. This will allow King County to regulate source-separated organics.

#### 10.04.020 GGGG. "Recyclable Materials"

Issue: Compostable (yard waste, food waste) are categorized as recyclable materials, causing confusion.

Recommendation: Remove "composting," "yard waste," and "food waste" from this definition. Rely on existing definition of organics at 10.04.020 UUU: "*Organics*" means *yard waste, food waste, and soiled paper products determined by the division director to be acceptable for composting.*

#### 10.04.020 JJJ. "Materials Recovery Facility"

Issue: Current definition excludes composting facilities.

Recommendation: Update definition to include facilities processing source-separated organics for recycling and composting.

#### Residual Organic Waste

Issue: Not currently defined.

Recommendation: Add a definition similar to residual C&D waste: "*Residual organic waste*" means *non-compostable waste remaining after the composting process.*

#### 10.08.140 Reporting<sup>65</sup>

Recommendation: In addition to the solid waste collection entities cited, require organic waste processing facilities to report tonnages received and residuals generated monthly.

Proposed language would state that for any residuals disposed at non-King County approved facilities, the facilities will not be required to physically return residuals to King County. Rather, if residuals are disposed outside of the County, the facility must remit the difference between the out-of-county disposal cost and King County tipping fee back to King County. This ensures financial equity while allowing operational flexibility.

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<sup>64</sup> KCC Chapter 10.04 [\[LINK\]](#)

<sup>65</sup> KCC Chapter 10.08 [\[LINK\]](#)

#### 10.18.060 Reporting Requirements

Recommendation: Require hauling partners to report composting program participation, including:

1. Set-out counts per month, by route, and by service area<sup>66</sup>
2. Average tons of organic waste collected per month in each city and unincorporated service area
3. Data separated by sectors

#### Expected outcomes

Stronger definitions, reporting, and enforcement will ensure that more organics are composted, less volume goes to landfill, and progress toward zero waste is measurable and equitable. The County will better be able to manage performance with reliable reporting and stronger data. As new technologies and practices emerge, these updates will provide a fair, enforceable policy framework that can evolve with innovation.

## VI. Conclusion/Next Steps

With passage of the state organics management law, Washington has advanced its goal to reduce the volume of organic materials being disposed of in landfills. Likewise, through its Re+ program, King County has established robust strategies to minimize the amount of recoverable waste, including organics waste, that ends up in the County's landfill. Nevertheless, more steady progress is needed to meet the County's zero waste goal. New policies and strategies to properly manage recoverable waste, including organics, as well as accountability among all interested parties, are needed.

Quantifying, let alone preventing, leakage of organics is particularly challenging due to the lack of reporting requirements for haulers and organic processing facilities. In addition, many regulations pertaining to organics management are silent regarding enforcement.

Through potential changes in Code definitions, reporting requirements, and enforcement, and in collaboration with partner cities and other interested parties, King County has the opportunity to significantly improve flow control and recovery of organics.

## VII. Appendices

Appendix A- City Regulations and Contracts

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<sup>66</sup>Set-out counts are counts of the dwelling units that make the contents of their recyclable materials and yard waste collection containers available for collection.

City	Contract / WUTC	Collection Company	Contract Start Date	Contract Expiration	Extensions	Contract Extension Expiration	Mandatory Garbage Collection in City Code	Mandatory Organics Collection in City Code	City Solid Waste Code Link (Excluding KC Comp Plan, YW Ban, Utility Tax & CPO)	City Code Details Related to Organics	Mandatory Organics Collection in Contract	Hauler Support of Mandatory	Allowance of Service Stop of Organics Due to Non-payment	Mandatory Organics Collection Contract Notes	Contamination Tagging Required in Contract	Frequency of Organics Collection	SF Organics Rate Structure	MF/Comm Organics Rate Structure
Enumclaw	City	City	-	-	-	-	Yes	No	<a href="#">8.12</a>	-	No Contract	-	-	-	-	EOW	Embedded	Subscription
Skykomish	City	City	-	-	-	-	Yes	No	<a href="#">8.15</a>	-	No Contract	-	-	-	-	N/A	N/A	N/A
Beaux Arts	WUTC	Republic	-	-	-	-	No	No	<a href="#">8.05</a>	-	No Contract	-	-	-	-	EOW	Subscription	Subscription
Black Diamond	WUTC	Republic	-	-	-	-	No	No	N/A	-	No Contract	-	-	-	-	EOW	Subscription	Subscription
Hunts Point	WUTC	Republic	-	-	-	-	No	No	<a href="#">8.30</a>	-	No Contract	-	-	-	-	EOW	Subscription	Subscription
Kenmore	WUTC	Republic	-	-	-	-	No	No	N/A	-	No Contract	-	-	-	-	EOW	Subscription	Subscription
Medina	WUTC	Republic	-	-	-	-	No	No	<a href="#">8.20</a>	-	No Contract	-	-	-	-	EOW	Subscription	Subscription
Woodinville	WUTC	WM	-	-	-	-	No	No	N/A	-	No Contract	-	-	-	-	Varies	Subscription	Subscription
Yarrow Point	WUTC	Republic	-	-	-	-	No	No	<a href="#">8.16</a>	-	No Contract	-	-	-	-	EOW	Subscription	Subscription
Auburn	Contract	WM	10/01/21	09/30/31	N/A	09/30/31	Yes	No	<a href="#">8.08</a>	8.08.120 A. commercial and residential yard debris cannot be comingled with garbage/recycling.  B. Compostables will not be accepted for pickup by a city-contracted service provider(s) if placed in plastic bags at curbside, or if the plastic bags containing compostables are placed in other approved containers for collection.	No Mandatory Organics Code	-	-	-	Yes	Weekly	Subscription	Subscription
Bellevue	Contract	Republic	06/29/14	06/30/21	1x7 years	06/30/28	No	No	<a href="#">9.26</a>	-	No Mandatory Organics Code	-	-	-	Yes	Weekly	Embedded	Embedded
Carnation	Contract	Recology	01/01/13	12/31/20	2x2 years	12/31/24 (Contract extended, exact date unknown)	Yes	No	<a href="#">8.12</a>	-	No Mandatory Organics Code	-	-	-	Yes	Weekly	Subscription	Subscription
Clyde Hill	Contract	Republic	07/11/21	06/30/29	1x7 years Mutual	06/30/36	No	No	<a href="#">8.28</a>	-	No Mandatory Organics Code	-	-	-	Yes	Varies	Subscription	Subscription
Covington	Contract	Republic	07/01/13	06/30/22	2x2 years	06/30/26	Yes	No	<a href="#">8.15</a>	-	No Mandatory Organics Code	-	-	-	Yes	EOW	Subscription	Subscription
Des Moines	Contract	Recology	01/01/24	10/31/33	N/A	10/31/33	No	No	<a href="#">7.08</a>	-	No Mandatory Organics Code	-	-	-	Yes	EOW	Subscription	Subscription
Duwall	Contract	WM	01/01/22	12/31/31	N/A	12/31/31	Yes	No	<a href="#">6.02</a>	-	No Mandatory Organics Code	-	-	-	Yes	Varies	Subscription	Subscription
Federal Way	Contract	WM	09/01/20	09/30/30	1x2 years	09/30/32	No	No	<a href="#">11.20</a>	-	No Mandatory Organics Code	-	-	-	Yes	Weekly	Subscription	Subscription
Issaquah	Contract	Recology	07/01/23	06/30/35	N/A	06/30/35	No	No	<a href="#">8.04</a>	-	No Mandatory Organics Code	-	-	-	Yes	Weekly	Embedded	Embedded 2 Carts

City	Contract / WUTC	Collection Company	Contract Start Date	Contract Expiration	Extensions	Contract Extension Expiration	Mandatory Garbage Collection in City Code	Mandatory Organics Collection in City Code	City Solid Waste Code Link (Excluding KC Comp Plan, YW Ban, Utility Tax & CPO)	City Code Details Related to Organics	Mandatory Organics Collection in Contract	Hauler Support of Mandatory	Allowance of Service Stop of Organics Due to Non-payment	Mandatory Organics Collection Contract Notes	Contamination Tagging Required in Contract	Frequency of Organics Collection	SF Organics Rate Structure	MF/Comm Organics Rate Structure
Kent	Contract	Republic	04/01/16	03/31/29	N/A	03/31/29	Yes	No	<a href="#">7.03</a>	-	No Mandatory Organics Code	-	-	-	Yes	EOW	Embedded	Subscription
Kirkland	Contract	WM	07/01/22	12/31/32	1x2 years	12/31/34	Yes	No	<a href="#">16</a>	-	No Mandatory Organics Code	-	-	-	Yes	Weekly	Embedded	Subscription
Lake Forest Park	Contract	Republic	07/01/18	06/30/28	2x2 years	06/30/32	No	No	<a href="#">8.04</a>	-	No Mandatory Organics Code	-	-	-	Yes	Weekly	Embedded	Subscription
Maple Valley	Contract	Recology	09/01/14	08/31/21	2x2 years	08/31/25	No	No	N/A	-	No Mandatory Organics Code	-	-	-	Yes	EOW	Subscription	Subscription
Mercer Island	Contract	Recology	10/01/19	09/30/29	1x2 years	09/30/31	No	No	<a href="#">8.04</a>	-	No Mandatory Organics Code	-	-	-	Yes	Weekly	Embedded	Subscription
Newcastle	Contract	WM	02/01/19	01/31/29	2x1 years	01/31/31	No	No	N/A	-	No Mandatory Organics Code	-	-	-	Yes	Weekly	Embedded	Subscription
Normandy Park	Contract	WM	08/01/18	07/31/28	2x2 years	07/31/32	No	No	<a href="#">13.25</a>	-	No Mandatory Organics Code	-	-	-	Yes	EOW	Subscription	Subscription
Redmond	Contract	WM	01/01/26	12/31/25	1x2 years	12/31/25	No	No	<a href="#">6.30</a>	-	No Mandatory Organics Code	-	-	-	Yes	Weekly	Embedded	Embedded
Renton	Contract	Republic	02/01/17	03/31/27	2x2 years	03/31/31	Yes	No	<a href="#">8.1</a>	-	No Mandatory Organics Code	-	-	-	Yes	Weekly	Embedded	Embedded
Sammamish	Contract	Republic	01/01/17	12/31/28	N/A	12/31/28	No	No	<a href="#">N/A</a>	-	No Mandatory Organics Code	-	-	-	Yes	Weekly	Embedded	Subscription
SeaTac	Contract	Recology	06/01/14	05/31/21	2x2 years	05/31/25	No	No	<a href="#">7.40</a>	-	No Mandatory Organics Code	-	-	-	Yes	EOW	Embedded	Subscription
Tukwila	Contract	Recology	11/01/23	10/31/33	1x2 years	10/31/35	No	No	<a href="#">22</a>	-	No Mandatory Organics Code	-	-	-	Yes	EOW	Subscription	Embedded 1st Year
Algona	Contract	WM	11/01/16	10/31/26	2x2 years Mutua	10/31/30	Yes	Yes	<a href="#">8.04</a>	All persons/properties shall use yard waste collection services.	No	-	-	-	Yes	EOW	Subscription	Subscription
North Bend	Contract	Recology	04/01/24	03/31/36	N/A	03/31/36	Yes	Yes	<a href="#">8.12</a>	All properties must pay for full garbage rate, regardless if they use recycling or compost service.	No	-	-	-	Yes	EOW	Embedded	Subscription
Pacific	Contract	WM	10/05/15	10/04/25	2x2 years Mutua	10/04/29	Yes	Yes	<a href="#">14.02</a>	Mandatory residential compostables subscription, but not required to use.	No	-	-	-	No	EOW	Embedded	Subscription
Shoreline	Contract	Recology	03/01/27	05/31/27	1x2 years	05/31/29	Yes	Yes	<a href="#">13.14</a>	All residential properties must subscribe to and pay for mandatory service, regardless if they use it or not.	No	-	-	-	Yes	Weekly	Embedded	Subscription

City	Contract / WUTC	Collection Company	Contract Start Date	Contract Expiration	Extensions	Contract Extension Expiration	Mandatory Garbage Collection in City Code	Mandatory Organics Collection in City Code	City Solid Waste Code Link (Excluding KC Comp Plan, YW Ban, Utility Tax & CPO)	City Code Details Related to Organics	Mandatory Organics Collection in Contract	Hauler Support of Mandatory	Allowance of Service Stop of Organics Due to Non-payment	Mandatory Organics Collection Contract Notes	Contamination Tagging Required in Contract	Frequency of Organics Collection	SF Organics Rate Structure	MF/Comm Organics Rate Structure
Bothell	Contract	Recology	07/01/25	06/30/22	3x1 years	06/30/25	Yes	Yes	<a href="#">8.2</a>	All persons shall be required to utilize the services of a solid waste hauler.	Yes	Promotion of mandatory ordinance. Hauler to reconcile their Customer list with a City-provided list of addresses.	Can discontinue service, but continue billing.	Organics shall be collected each week from all participating Single-Family Residence Customers	Yes	Weekly	Embedded	Subscription
Burien	Contract	Recology	06/01/25	05/31/21	2x2 years	05/31/25	Yes	Yes	<a href="#">8.15</a>	Only food service establishments are subject to mandatory compostables collection.	Yes	Promotion of mandatory ordinance.	Minimum service level.	In the event the City decides to implement mandatory collection, the Contractor shall assist the City with enforcing such requirement.	Yes	Weekly	Embedded	Subscription
Snoqualmie	Contract	WM	06/01/12	05/31/19	3x2 years	05/31/25	Yes	Yes	<a href="#">8.12</a>	All business, commercial, industrial or residential garbage, recyclables and compostables shall be removed and disposed of by the contractor.	Yes	Promotion of mandatory ordinance.	Minimum service level.		Yes	Weekly	Embedded	Subscription

**Construction and Demolition Materials  
Flow Control Analysis and Enforcement Report**

November 21, 2025



**King County**

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## II. Proviso Text

Ordinance 19861, Section 109 Solid Waste, Department of Natural Resources and Parks, Proviso P1<sup>1</sup>

P1 PROVIDED THAT:

Of this appropriation, \$500,000 shall not be expended or encumbered until the executive transmits a flow control analysis and enforcement report and a motion that should acknowledge receipt of the flow control analysis and enforcement report, and a motion acknowledging receipt of the flow control analysis and enforcement report is passed by the council. The motion should reference the subject matter, the proviso's ordinance, ordinance section, and proviso number in both the title and body of the motion.

A. The solid waste division ("the division") may contract with a consultant to produce the flow control analysis and enforcement report. "Flow control" for the purposes of this report refers to the methods used by governmental entities to control the disposition of waste generated within its jurisdiction. The methods may include, but are not limited to, policies, ordinances, regulations, contracts, and agreements. The consultant shall specifically focus its efforts on the flow of construction and demolition ("C&D") materials in the county's regional solid waste system, which shall include recyclable, nonrecyclable, and mixed loads of materials. As part of the consultant's work to produce the report, the consultant shall evaluate overall flow control compliance for C&D materials in the county system. The evaluation should be accomplished through review of available data and reporting information, through anecdotal evidence, and through analysis of any policy and enforcement gaps. The division should furnish any records or data as requested by the consultant.

B. The flow control analysis and enforcement report shall include, but not be limited to:

1. An inventory and descriptions of existing flow control methods applicable to C&D materials. The flow control methods shall include, but not be limited to, flow control methods used by the federal government, state government, King County, and cities participating in the county's regional solid waste system through interlocal agreement;
2. A summary of enforcement efforts undertaken by the county related to its flow control methods for C&D materials;
3. Findings from the evaluation of flow control compliance for C&D materials; and
4. Recommended actions and policies the county could take to improve flow control compliance for C&D materials. The executive should electronically file the flow control analysis and enforcement report and a motion required by this proviso by December 15, 2025, with the clerk of the council, who shall retain an electronic copy and provide an electronic copy to all councilmembers, the council chief of staff, and the lead staff for the transportation, economy, and environment committee or its successor.

## III. Executive Summary

In response to a proviso in Ordinance 19861, the Solid Waste Division (SWD) of the Department of Natural Resources and Parks (DNRP) contracted with Cascadia Consulting Group, Inc., to produce a flow control analysis and enforcement memorandum for construction and demolition (C&D) materials in the

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<sup>1</sup> Ordinance 19861 [[LINK](#)]

County's regional solid waste system. C&D materials include recyclable, nonrecyclable, and mixed loads of materials.

"Flow control" refers to the methods used by SWD to control the disposition of C&D waste generated within its jurisdiction. The methods include, but are not limited to, policies, ordinances, regulations, contracts, and agreements.

King County requires that readily recyclable C&D materials — including metal, cardboard, wood, concrete, asphalt paving, brick, and new drywall scrap — be recycled at County-designated materials recovery facilities. The intent of the County's C&D program is to divert C&D materials from landfills and facilitate multiple uses of this material to support a circular economy.

The two main types of facilities to receive nonrecyclable and mixed C&D materials generated in King County are:

- **C&D waste transfer facilities**, which receive nonrecyclable C&D materials to be disposed in a landfill.
- **C&D processing facilities**, which receive mixed recyclable C&D materials, from which they recover as much of the recyclable C&D material as possible before disposing of the nonrecyclable portion.

In 2024, an estimated 1.5 million tons of C&D materials were generated in King County, with the majority going to single-commodity facilities. About 260,000 tons of C&D waste were disposed at private municipal solid waste (MSW) landfills outside of King County.

### Existing C&D Flow Control Methods

Under federal law, King County may lawfully implement flow control if it serves legitimate public purposes and does not favor private in-state entities over out-of-state competitors.

#### *State Flow Control Methods*

Several state laws in the Revised Code of Washington (RCW) and regulations in the Washington Administrative Code (WAC) relate to flow control authority or requirements that certain types of waste be delivered to certain types of facilities. Two important examples are:

**Chapter 36.58 RCW (Solid Waste Disposal)** is intended to preserve a county's control over disposal of waste collected within the county to protect its substantial investment in its solid waste management system.<sup>2</sup>

**Chapter 70A.205 RCW (Solid Waste Management—Reduction and Recycling)** establishes that primary responsibility for management of solid waste generated within unincorporated county areas (and areas subject to interlocal agreements with cities) rests with county government.<sup>3</sup>

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<sup>2</sup> Chapter 36.58 RCW [\[LINK\]](#)

<sup>3</sup> Chapter 70A.205 RCW [\[LINK\]](#)

### *King County Flow Control Methods*

King County Code (KCC) Title 10, “Solid Waste,” illustrates and defines flow control through its establishment of a comprehensive and mandatory solid waste management system. It defines flow control by mandating where waste must be taken and by regulating the facilities that can receive it.<sup>4</sup>

Central to King County C&D flow control, Chapter 10.30 (Construction and Demolition Waste) focuses on establishing C&D waste disposal facilities to serve King County and ensuring that C&D is recycled to the maximum extent possible, in accordance with the County’s Comprehensive Solid Waste Management Plan.<sup>5</sup> This chapter establishes requirements or prohibitions for where generators, handlers, and collectors of C&D waste may deliver the material. It also establishes the specific process and requirements for receiving approval to haul materials directly to a landfill or intermodal facility.

Restrictions and requirements are also established for:

- accepted materials and performance requirements
- facility reporting requirements
- SWD reporting requirements

Demolition permits can also function as a flow control method for C&D material by allowing local jurisdictions to identify sources of C&D waste and regulate how and where debris is taken for processing or disposal. At least four cities that participate in King County’s solid waste system have laws or regulations related to deconstruction or C&D waste diversion reporting, but only Issaquah and Redmond have C&D flow control, or requirements that certain types of waste be delivered to certain types of facilities.

### **Enforcement of Flow Control**

King County undertakes enforcement efforts related to its flow control methods for C&D materials to ensure compliance with its ordinances and achieve its recycling and waste diversion goals. Any person who violates related rules is subject to enforcement and civil penalties.

The County enforces flow control using six primary methods:

- Designated C&D waste transfer station reporting and inspections
- Mixed C&D designated facility reporting and inspections
- Demolition site inspections using permit data
- Jobsite verification of adherence to C&D requirements for projects requesting permission to directly haul to landfill/intermodal yard
- C&D residuals testing at mixed C&D facilities
- King County transfer station special waste monitoring and issuance of Unacceptable Waste Reports

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<sup>4</sup> KCC Title 10 [\[LINK\]](#)

<sup>5</sup> KCC Chapter 10.30 [\[LINK\]](#)

## Findings from Compliance Evaluation

Based on 2021 countywide C&D data, 51.2 percent of C&D material delivered to King County-designated facilities was diverted and the rest was disposed. C&D single-commodity facilities receiving materials from King County achieved a 100 percent diversion rate in 2021.<sup>6</sup>

Several areas of leakage, compliance gaps, and areas of noncompliance have been identified. Examples include:

- **Failure to use designated facilities:** The primary area of noncompliance is the disposal or delivery of mixed C&D materials or nonrecyclable C&D waste to facilities not designated by King County, or to facilities that are designated, but for a different waste type.
- **Noncompliance with waste diversion plans approved for landfill direct disposal:** Generators may fail to separate readily recyclable materials as outlined in their approved waste diversion plan.
- **Inappropriate use of King County transfer station C&D exemption:** King County code allows County transfer stations to accept "small quantities of C&D waste" if loads are "transported by vehicles or trailers that do not have mechanized dump beds, either hydraulic or otherwise." This has led to large loads of C&D material being brought to the transfer stations in large panel vans and moving trucks.<sup>7</sup>
- **Improper on-site practices:** Commingling of recyclable and nonrecyclable C&D materials at jobsites could lead to improper disposal.

## Recommended Actions and Policies

Recommendations were identified by the consultant and SWD subject-matter experts in the areas of consultation, actions/policies, literature review, and outreach and communication. It is important to note that these are preliminary recommendations based on research and analysis. Pursuit or adoption of actions and policies would be based on community and industry engagement, feedback, and analysis, as well as equity impact review.

Highlights include:

- **Work** with cities to gain faster notification of demolition permits, allowing more demolition sites to be inspected by the County prior to demolition.
- **Require** deconstruction (instead of demolition) for King County-owned buildings.
- **Consult** with C&D contractors to gather feedback on operational challenges, clarity of regulations, and the feasibility of compliance methods.
- **Consult** with waste haulers to understand logistical challenges, impacts of flow control on routes, and suggestions for improving waste characterization and reporting.
- **Encourage** deconstruction (instead of demolition) in all permitting jurisdictions for select project sizes or project types to increase C&D debris recovery.
- **Require** C&D plans to be submitted for all demolition permits in unincorporated King County and allow time for SWD to review before demolition permits become active.
- **Require** jobsite separation of C&D recyclables from C&D nonrecyclable waste.

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<sup>6</sup> King County Solid Waste Division (2025). Construction & Demolition Diversion Data. Compiled from Washington State Department of Ecology input (unpublished internal dataset).

<sup>7</sup> [KCC Chapter 10.30.020.E.1 \[LINK\]](#)

- **Conduct** regular literature reviews encompassing academic research, industry best practices, and reports from other leading jurisdictions regarding C&D waste management, flow control efficacy, and innovative recycling technologies.
- **Explore** regulatory structures, enforcement strategies, and incentive programs used elsewhere.
- **Create** easy-to-access online resources to make it easier for haulers and C&D site contractors to find information relevant to their specific situation (e.g., what ordinances apply to them and why, and what specific steps must be taken to maintain compliance).

SWD hopes to further evaluate and pursue these and other opportunities. Increased collaboration and engagement with the community and industry is needed to identify the most effective strategies to strengthen flow control and increase the diversion of C&D materials from landfills and back into the circular economy.

## IV. Background

**Department Overview:** The King County Department of Natural Resources and Parks (DNRP) works in support of sustainable and livable communities and a clean and healthy natural environment. Its mission is to foster environmental stewardship and strengthen communities by providing regional parks, protecting the region’s water, air, land, and natural habitats, and reducing, safely disposing of, and creating resources from wastewater and solid waste.<sup>8</sup>

The Solid Waste Division of DNRP (the Division, or SWD) provides garbage transfer and disposal, as well as recycling services, for approximately 1.3 million residents and 660,000 employees in King County. The King County solid waste system serves a large unincorporated area and 37 of the 39 cities in King County.<sup>9</sup>

**Key Historical Context:** Flow control methods use legal authorities available to state and local governments to designate where certain wastes must be taken for consolidation, transfer, processing, treatment, or disposal. This waste management approach seeks to direct waste to specific facilities, which can be publicly or privately owned. Flow control methods can take various forms such as, but not limited to, laws or regulations explicitly directing waste to specific facilities, laws or regulations directing waste to facilities that meet certain requirements, or contracts for service that require using specific facilities.

Prior to 1993, there were local landfills in King County that accepted construction and demolition (C&D) material, however, once those landfills closed, the Division found that its facilities and systems had not been designed to accommodate the weight and dimensions of some of the C&D materials. The King County Construction and Demolition program and its strategies regarding flow control began in 1993 with the signing of contracts with Waste Management, Inc., and a forerunner of Republic Services for the companies to dispose of C&D materials in their own municipal solid waste (MSW) landfills. These contracts were revised, renewed, and extended until the end of 2015.

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<sup>8</sup>Department of Natural Resources and Parks [\[LINK\]](#)

<sup>9</sup>About the Solid Waste Division [\[LINK\]](#)

Through a King County Ordinance passed in 2015, contracting for the management of C&D materials was expanded from waste management companies only to King County-designated materials recovery facilities, or MRFs.<sup>10</sup> This greatly increased (1) the number of locations to which King County contractors and homeowners could take C&D materials, and (2) the amount of recyclable material being recycled, while ensuring that nonrecyclable C&D waste was being properly managed.

In 2016, there were several companies that owned and operated designated C&D MRFs. Competition helped keep prices down, provided high-quality service, and facilitated higher facility diversion rates. By 2024, however, all of the C&D material recovery providers had been purchased by one company. In 2025, two independent companies began accepting King County-generated C&D materials at their MRFs.

**Key Current Context:** King County requires readily recyclable C&D materials — including metal, cardboard, wood, concrete, asphalt paving, brick, and new drywall scrap — be recycled at County-designated MRFs. SWD has a C&D program that includes technical assistance, public education, policy, enforcement, and data management. The intent of the program is to divert C&D materials from landfills and facilitate multiple use of C&D material to support a circular economy.

Requiring that certain C&D materials are recycled rather than landfilled reduces the production of several potentially harmful substances, including:

- Hydrogen sulfide from drywall, which could have health impacts and contribute to landfill fires
- Methane produced from wood and cardboard: methane is a major greenhouse gas, and significantly contributes to climate change
- Leachate from concrete: the majority is basic, i.e., with a pH greater than 7, which could have negative impacts on surface water and community well water<sup>11</sup>

There are two main types of facilities to receive nonrecyclable and mixed C&D materials generated in King County.<sup>12</sup>

1. **C&D waste transfer facilities** receive nonrecyclable C&D materials. These facilities do not process the materials, and all material is disposed of in private, King-County-approved landfills outside the county.<sup>13</sup>
2. **C&D processing facilities**, also referred to as C&D MRFs, receive mixed recyclable C&D materials, from which they recover as much of the recyclable C&D material as possible before disposing of the nonrecyclable portion.

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<sup>10</sup>Ordinance 18166 [\[LINK\]](#)

<sup>11</sup>Leachate is liquid, e.g., rainwater, that passes through a material and extracts one or more components of the material.

<sup>12</sup>Designated C&D Facilities - King County [\[LINK\]](#)

<sup>13</sup>King County has approved disposal of non-recyclable C&D waste at Columbia Ridge Landfill (WM), Wenatchee Landfill (WM), Roosevelt Landfill (Republic), Headquarters Landfill (Cowlitz County), and Waste Connections' LRI and Finley Buttes landfills.

The requirement that C&D waste be disposed of only in approved MSW landfills ensures that the materials noted above are adequately monitored and their environmental and health impacts minimized to the extent possible.

At the end of 2024, there were seven designated processing facilities and four waste transfer facilities in the region to receive C&D materials generated in King County.

In 2024, an estimated 1.5 million tons of C&D materials were generated in King County, with the majority going to single-commodity facilities. About 260,000 tons of C&D waste was disposed of at private MSW landfills. This generated \$1.06 million in revenue for use by the Division's C&D Program.

Effective January 1, 2025, King County Council approved increasing SWD's fee on C&D material disposed of in a landfill from \$4.25 per ton — the fee since 1993 — to \$13 per ton. The fee increase brought the County rate closer to those in other jurisdictions: Seattle's C&D transfer fee is \$13.27 per ton and Portland charges \$30 per ton. The fee increase also generates revenue that supports systemic changes to increase diversion. Among the goals established by the C&D program are the following:

- Internal C&D trainings for County project managers and contract specialists
- Trainings for contractors
- Career development training and education for black, indigenous, and people of color and disadvantaged communities about existing programs with available staffing capacity
- Deconstruction and salvage assessments
- Solid waste diversion programs and projects that result in positive revenue and environmental impact after initial investment
- Outreach efforts to city partners to adopt similar policies to address systemic issues

**Report Methodology:** SWD contracted with Cascadia Consulting Group, Inc., to produce a flow control analysis and enforcement memorandum for C&D materials in the County's regional solid waste system. C&D materials include recyclable, nonrecyclable, and mixed loads of materials. In addition to desktop research conducted by the consultant, research on enforcement of city codes was conducted by SWD staff via outreach to the cities that have C&D provisions in their codes.

"Flow control," for the purposes of this report, refers to the methods used by SWD to control the disposition of C&D waste generated within its jurisdiction. The methods include, but are not limited to, policies, ordinances, regulations, contracts, and agreements.

## V. Report Requirements

This report is organized to align with the requirements of the proviso.

### B.1. Inventory and descriptions of existing flow control methods applicable to C&D materials

This section presents an inventory and descriptions of existing flow control methods applicable to C&D materials within King County. They include flow control methods used by the federal government, state government, King County, and cities participating in the County's regional solid waste system through interlocal agreements.

## Federal Flow Control Methods

King County may lawfully implement flow control if it serves legitimate public purposes and does not favor private in-state entities over out-of-state competitors. The statute and federal and state cases discussed below are pertinent to local authority for flow control.

**Commerce Clause:** The Commerce Clause, which comprises Article I, Section 8, Clause 3 of the U.S. Constitution, gives Congress broad power to regulate interstate commerce and restricts states from impairing interstate commerce.<sup>14</sup>

**Philadelphia v. New Jersey (437 U.S. 617, 1978):** A state statute that prohibited the importation of most out-of-state solid waste into in-state landfills was struck down. The Court held this violated the Commerce Clause by discriminating against out-of-state waste shipments.<sup>15</sup>

**Chemical Waste Management, Inc. v. Hunt (504 U.S. 334, 1992):** A fee imposed by Alabama on out-of-state hazardous waste (i.e., a surcharge on imported hazardous waste) violated the Commerce Clause. The decision emphasized that states cannot economically isolate themselves from shared problems such as hazardous waste disposal.<sup>16</sup>

**C&A Carbone, Inc. v. Town of Clarkstown, N.Y. (511 U.S. 383, 1994):** A municipal ordinance requiring nonrecyclable solid waste to be delivered to a designated private facility (flow control) was held unconstitutional under the Dormant Commerce Clause.<sup>17</sup> The Court ruled that local preference that burdens out-of-state competition is *per se* invalid unless no alternative means exist to further a legitimate local interest.<sup>18</sup>

**United Haulers Ass'n, Inc. v. Oneida-Herkimer Solid Waste Management Authority (550 U.S. 330 (2007)):** This Supreme Court case is the primary legal precedent that supports the constitutionality of county-level flow control ordinances, particularly those requiring garbage to be directed to designated facilities.<sup>19</sup>

**SkyCorp Ltd. v. King County, 2024 WL 562169:** A County ordinance requiring that anyone who generates, handles, or collects mixed or nonrecyclable C&D waste within King County must dispose of such waste in county-designated facilities was upheld as a reasonable exercise of King County's police power to regulate sanitation.<sup>20</sup>

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<sup>14</sup> [Article 1 Section 8 Clause 3, Library of Congress](#), Constitution Annotated [\[LINK\]](#)

<sup>15</sup> [Philadelphia v. New Jersey \[LINK\]](#)

<sup>16</sup> [Chemical Waste Management, Inc. v. Hunt \[LINK\]](#)

<sup>17</sup> "Although the Commerce Clause is framed as a positive grant of power to Congress and not an explicit limit on states' authority, the Supreme Court has also interpreted the Clause to prohibit state laws that unduly restrict interstate commerce even in the absence of congressional legislation — i.e., where Congress is dormant." (Library of Congress, Constitution Annotated [\[LINK\]](#))

<sup>18</sup> [C&A Carbone, Inc. v. Town of Clarkstown, N.Y. \[LINK\]](#)

<sup>19</sup> [United Haulers Ass'n, Inc. v. Oneida-Herkimer Solid Waste Management Authority \[LINK\]](#)

<sup>20</sup> [SkyCorp Ltd. v. King County \[LINK\]](#)

## State Flow Control Methods

Several state laws in the Revised Code of Washington (RCW) and regulations in the Washington Administrative Code (WAC) relate to flow control authority or requirements that certain types of waste be delivered to certain types of facilities.

**Chapter 36.58 RCW (Solid Waste Disposal)** is intended to preserve a county's control over disposal of waste collected within the county to protect its substantial investment in its solid waste management system.<sup>21</sup> King County derives its authority to designate disposal sites for mixed and nonrecyclable construction and demolition waste generated in the unincorporated areas of the County from these provisions of state law.

**Chapter 70A.205 RCW (Solid Waste Management—Reduction and Recycling)** establishes that primary responsibility for management of solid waste generated within unincorporated county areas (and areas subject to interlocal agreements with cities) rests with county government.<sup>22</sup>

**Chapter 70A.205.040 RCW (County Comprehensive solid waste management plan—Joint plans—Requirements when updating—Duties of cities)** requires counties to prepare comprehensive solid waste management plans that include strategies for managing C&D waste for recycling or reuse.<sup>23</sup> Cities within the county must either deliver their own plans for the county to integrate into its comprehensive plan, enter into an agreement with the county to prepare a joint city-county plan, or authorize the county to prepare a plan for the city.

All of the cities in King County, with the exception of Seattle and Milton, have signed interlocal agreements (ILAs) with SWD, which authorize the Division to prepare a comprehensive solid waste management plan covering unincorporated King County and all of the ILA cities. The Washington State Department of Ecology (Ecology) is authorized to review all county comprehensive solid waste management plans for approval.

**Chapter 81.77 RCW (Solid Waste Collection Companies)** establishes that the Washington Utilities and Transportation Commission (WUTC) shall supervise and regulate every solid waste collection company in the state.<sup>24, 25</sup> It further states that solid waste collection companies operating in unincorporated areas of a county must comply with the county's solid waste management plan.

**Chapter 36.58.040 RCW (Solid waste handling systems authorized—Disposal sites—Contracts for solid waste handling and collection of source-separated recyclable material—Waste reduction and recycling)** establishes that "any solid waste collected by a private hauler operating under a certificate granted by the Washington Utilities and Transportation Commission (WUTC), under provision from chapter 81.77 RCW, for which the certificate is for collection in a geographic area lying in more than one

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<sup>21</sup>Chapter 36.58 RCW [\[LINK\]](#)

<sup>22</sup>Chapter 70A.205 RCW [\[LINK\]](#)

<sup>23</sup>Chapter 70A.205.040 RCW [\[LINK\]](#)

<sup>24</sup>Chapter 81.77 RCW [\[LINK\]](#)

<sup>25</sup>The 2022 Washington appellate decision in *Waste Management of Washington, Inc. v. WUTC* upheld WUTC's authority to regulate hauling activities, including rail transportation, as not pre-empted by federal law. [\[LINK\]](#)

county, such as designation of disposal sites, shall be pursuant to an interlocal agreement between the involved counties.”<sup>26</sup>

**Chapter 36.58.050 RCW (Solid waste disposal—Transfer stations)** states that hauling solid waste between transfer stations and disposal sites, if identified in a local solid waste management plan, is exempt from WUTC regulation based on Chapter 81.77 RCW.<sup>27</sup>

### King County Flow Control Methods

Several parts of King County Code (KCC), regulations, and plans that have been adopted relate to flow control or requirements that certain types of waste generated in King County be delivered to certain types of facilities.

KCC Title 10, “Solid Waste,” illustrates and defines flow control through its establishment of a comprehensive and mandatory solid waste management system. It defines flow control by mandating where waste must be taken and by regulating the facilities that can receive it. The chapters described below are found in KCC Title 10.<sup>28</sup>

**Chapter 10.08.020 (Solid Waste Sites—System of Disposal)** requires solid waste facilities in King County, including C&D facilities, to operate in a way that is consistent with King County’s Comprehensive Solid Waste Management Plan (Comp Plan).<sup>29</sup>

**Chapter 10.08.080 (Recycling)** states that a goal for King County’s solid waste management shall be to achieve maximum feasible cost-effective reduction of solid waste going to landfills and to other processing facilities, conservation of energy and natural resources, and environmental protection.<sup>30</sup> The division shall develop plans and incentives for waste reduction through source separation, recycling, product stewardship, resource conservation, and other methods deemed effective by the division. Reclamation facilities for recycling operations shall be designated as part of the County’s disposal system and shall be subject to permit requirements of the health department.

**Chapter 10.30 (Construction and Demolition Waste)** focuses on establishing C&D waste disposal facilities to serve King County and ensuring that C&D is recycled to the maximum extent possible, in accordance with the Comp Plan.<sup>31</sup> Described further below, this chapter establishes requirements and prohibitions for where generators, handlers, and collectors of C&D waste can deliver the material. It also establishes the specific process and requirements for receiving approval to haul materials directly to a landfill or intermodal facility.

**The King County Comprehensive Solid Waste Management Plan** was prepared and adopted by the County in compliance with state law.<sup>32</sup> King County prepared and adopted its most recent Comp Plan in 2019. This plan outlined waste prevention goals and strategies for the subsequent six years, with

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<sup>26</sup>Chapter 36.58.040 RCW [\[LINK\]](#)

<sup>27</sup>Chapter 36.58.050 RCW [\[LINK\]](#)

<sup>28</sup> KCC Title 10 [\[LINK\]](#)

<sup>29</sup>KCC Chapter 10.08.020 [\[LINK\]](#)

<sup>30</sup>KCC Chapter 10.08.080 [\[LINK\]](#)

<sup>31</sup>KCC Chapter 10.30 [\[LINK\]](#)

<sup>32</sup>King County Comprehensive Solid Waste Management Plan [\[LINK\]](#)

consideration for the next 20 years. The Comp Plan is currently being updated, with adoption of the new plan anticipated in late 2029.

### *Generator, Handler, and Collector Requirements*

Under KCC 10.30.020, anyone who generates, handles, or collects mixed or nonrecyclable construction and demolition waste within King County shall deliver, or ensure delivery to, a designated C&D receiving facility.<sup>33</sup> The County has designated facilities in King, Pierce, Snohomish, Skagit, and Yakima counties for this purpose. A "generator" may include, but is not limited to, a property owner, a demolition contractor, or general contractor engaging in construction, remodeling, repair, or demolition of buildings, roads, or other structures that generate C&D waste.

Per KCC 10.30.020.A.4, generators, handlers, and collectors of mixed or nonrecyclable C&D materials must deliver them to designated C&D receiving facilities and may not deliver them directly to a landfill or intermodal facility — except for eligible C&D demolition projects with an approved waste diversion plan.<sup>34</sup>

Nonrecyclable C&D waste loads that are visually assessed to have no more than 20 percent recyclable C&D materials banned from landfill disposal may be delivered to a designated C&D waste transfer station. Banned materials include clean wood, cardboard, metal, new gypsum scrap, asphalt paving, brick, and concrete.

Generators of nonrecyclable C&D waste may deliver loads directly to a designated C&D receiving facility that is an intermodal facility or landfill only with a County-approved waste management plan and submittal of a waste diversion report within 60 days of completing demolition.

Recyclable C&D materials may be transported to any recycling facility or market. C&D materials that are banned from disposal must be recycled.

### *Direct-to-Landfill Requirements*

When there is the intent to take C&D waste directly to a landfill or intermodal (rail) yard, for eligible C&D demolition projects — generally, projects exceeding 6,000 square feet of aggregated building or structure space to be demolished — a waste diversion plan must be submitted to and approved by SWD before demolition can proceed.

Following the completion of demolition activities, a waste diversion report must be submitted to the Division within 60 days to verify compliance with the approved plan. The report must be accompanied by receipts from the receiving facilities (intermodal facilities, landfills, C&D recycling facilities, or C&D receiving facilities).

### *Designated C&D Facility Requirements*

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<sup>33</sup>KCC Chapter 10.30.020 [[LINK](#)]

<sup>34</sup>KCC Chapter 10.30.020.A.4 [[LINK](#)]

The King County Code designates two main types of facilities to receive nonrecyclable and mixed C&D materials generated in King County (see Table 1).<sup>35</sup>

1. C&D waste transfer facilities receive nonrecyclable C&D materials. These facilities do not process the materials, and all material is disposed in a landfill.
2. C&D processing facilities, also referred to as C&D MRFs, receive mixed recyclable C&D materials, from which they recover as much of the recyclable C&D material as possible before disposing of the nonrecyclable portion of C&D waste.

Recyclable C&D material that is separated into specific commodities at a jobsite may be taken to any single-commodity recycler. This is most often done with concrete, metal, clean wood, new drywall scrap, and cardboard.

**Table 1. Designated C&D Facilities**

Nonrecyclable C&D Disposal Facilities	Mixed Recyclable C&D Processing Facilities
Black River (Republic)	DTG – Maltby
Cascade Recycling Center (WM) <i>Temporarily Closed</i>	DTG – Redmond
Eastmont (WM)	DTG – Renton
Recycle Northwest (WM)	DTG – Seattle
	DTG – Tacoma (Recovery1)
	DTG – Yakima
	Lautenbach Recycling—Mt. Vernon
	MCS Recycling—Seattle

[Accepted Materials and Performance Requirements](#)

The Designated Facility Agreement (DFA), which was updated in Ordinance 19347, describes what materials are accepted at each facility and the performance requirements that C&D MRFs must achieve.<sup>36</sup>

Details regarding permittee rights and obligations and banned materials are provided in Appendix A.

The ordinance defines C&D material as “any non-putrescible recyclable or nonrecyclable waste that results from construction, remodeling, repair, or demolition of buildings, roads, or other structures and requires removal from the site of construction or demolition.”

Under the DFA, the permittee must accept C&D materials, with exceptions allowed for factors such as lack of capacity, a customer that has previously failed to exclude unacceptable waste, excessive contamination with other waste, and other circumstances.

<sup>35</sup>Designated C&D Facilities - King County [\[LINK\]](#)

<sup>36</sup>Ordinance 19347 [\[LINK\]](#)

The permittee is prohibited from accepting unacceptable waste at the facility, as well as any material specified by the Director of SWD and published in the Director’s List of Readily Recyclable Construction and Demolition Materials Banned from Disposal on the SWD website.<sup>37, 38</sup>

Permittees may not dispose at a landfill any load of C&D waste that contains more than 10 percent of those materials listed in the Director’s List, and the Division has the right to inspect and sample residuals at MRFs to monitor compliance.

### Facility Reporting Requirements

The DFA requires MRFs and transfer facilities to submit a monthly report.<sup>39</sup> The reports include:

- (1) Inbound tons by city or unincorporated area of origin.
- (2) Tonnage of mixed and nonrecyclable C&D waste received from within the county jurisdiction.
- (3) Tonnage of mixed and nonrecyclable C&D waste received from outside the county jurisdiction.
- (4) Outbound tons by material type and destination.

### Solid Waste Division Reporting Requirements

The KCC requires SWD to submit an annual report to the King County Council that describes progress in implementing the provisions of the C&D waste program, including, but not limited to:<sup>40</sup>

- Participation by vendors who have signed DFAs
- The number and types of enforcement actions taken
- Effectiveness of enforcement strategy
- Engagement with vendors on enforcement strategies, through mechanisms such as an enforcement advisory group or outreach efforts
- Regulatory fee collection (including the C&D tip fee surcharge)
- Effectiveness of efforts to ensure waste is delivered exclusively to designated facilities
- Volumes and nature of residual C&D waste being sent to landfills for disposal
- C&D recycling rate

### **Demolition Permits**

Demolition permits can function as a flow control method for C&D material by allowing local jurisdictions to identify sources of C&D waste and regulate how and where debris is taken for processing or disposal. Demolition permits have the potential to dictate how C&D materials are produced — i.e. through demolition or deconstruction — and transported to designated facilities, ensuring compliance with environmental, recycling, and infrastructure goals.<sup>41</sup>

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<sup>37</sup>Unacceptable waste is any material for which the transportation or disposal would constitute a violation of any governmental requirement pertaining to health, safety, or the environment.

<sup>38</sup>Director’s List [\[LINK\]](#)

<sup>39</sup> The King County C&D Facility Reporting Tracker for 2022 through 2024 is included as Appendix B

<sup>40</sup> KCC 10.14.080 [\[LINK\]](#)

<sup>41</sup> In the Washington State Residential Code, Section AWZ102.1, deconstruction is defined as “the systematic disassembly of a structure in order to salvage building materials or components for the primary purpose of reusing materials to the maximum extent possible, with a secondary purpose of recycling the remaining materials.” [\[LINK\]](#)

In King County, each city has its own permit system (see section below). Generally, demolition permits are required but parameters vary by jurisdiction. Requirements for unincorporated King County are described below.

### *Applicant Submittal and County Review*

For unincorporated King County, demolition permit applications are typically submitted online to the King County Permitting Division. The applicant must submit a demolition permit application form, site plan, and other supporting documents.

Demolition permits submitted to the County receive a multidisciplinary review that may include building, fire, critical areas, or engineering staff, depending on the project location and scope. If the project is demolition of residential buildings and does not trigger other code requirements, such as critical-area mitigation or floodplain development review, the permit may be issued subject to field inspection by Permit Review Coordinators.

### **City C&D Management Methods**

At least four cities that participate in King County’s solid waste system have laws or regulations related to deconstruction or C&D waste diversion reporting, but only Issaquah and Redmond have C&D flow control, or requirements that certain types of waste be delivered to certain types of facilities. This section summarizes requirements from their municipal codes.

#### *Issaquah*

Issaquah’s local C&D flow control code outlines different types of projects and their specific requirements as well as exemptions.<sup>42</sup> The exemptions include emergency and disaster response work as well as removal of buildings or structures determined to be hazardous or dangerous by a building official. The code includes “small projects,” which are new single-family home building permits for additions and remodels greater than 1,000 square feet, demolition permits for buildings of less than 2,500 square feet, and tenant improvement permits of less than 5,000 square feet. Small projects require a minimum of two C&D bins on site: one for landfill waste and one for commingled recyclable material. Commingled recyclable material must be sent to a King County-designated C&D processing facility. “Large projects” include all projects not defined as small projects and require a waste diversion plan prior to issuance. Large projects must also have at least two C&D bins on site at all times for commingled recyclable material and landfill waste. Large projects must also divert to recycling a minimum of 50 percent of material removed from the site.

#### *Redmond*

Redmond’s local C&D flow control code adheres to King County Code and states that all banned materials shall be diverted from disposal and mixed C&D waste must be sent to a MRF for processing.<sup>43</sup> The code requires a deconstruction and salvage assessment for all non-new construction projects, a statement of compliance with Puget Sound Clean Air Agency or Washington Department of Labor & Industries, and a waste diversion report that must be submitted prior to Certificate of Occupancy. The

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<sup>42</sup>Issaquah Municipal Code Chapter 16.40 [\[LINK\]](#)

<sup>43</sup>Redmond Municipal Code Chapter 154.30.040 [\[LINK\]](#)

waste diversion report must include receipts or signed documentation from the facility with weights of material disposed, permit numbers or site addresses, and receiving locations. Redmond requires mixed C&D to be taken to King County-designated C&D processing facilities. The City requires waste tickets from the designated facilities showing tons delivered and tickets for source-separated materials, shown by material.

### *Kenmore*

Kenmore Municipal Code requires deconstruction when a building or structure needs to be demolished and requires that deconstruction be done in a way that allows for reuse of salvaged materials — for example, by not using heavy machinery.<sup>44</sup> However, the code does not address flow control. A building permit is required prior to the start of demolition or construction.<sup>45</sup>

### *Shoreline*

Shoreline’s local C&D flow control code requires C&D projects to apply for a permit for constructing structures greater than 1,000 square feet; removing an entire building or structure greater than 1,000 square feet; making alterations greater than 1,000 square feet, or tenant improvements greater than 2,500 square feet.<sup>46</sup> In order to be approved for the permit, a waste diversion plan must be submitted prior to permit issuance. The plan must identify the amount, by weight and volume, of C&D material to be removed and the receiving facility or location for each commodity. The City of Shoreline also requires a deconstruction and salvage assessment prepared by a third party. All construction and building material recycling loads that contain more than a single commodity are to be disposed of at a third-party certified processing facility. All job sites proposing waste recycling are to have at least one bin for recyclable materials that will be sent to a processing facility for recycling for beneficial use, and a separate bin for construction and building removal waste destined for a landfill.

## **B.2. Summary of enforcement efforts undertaken by the county related to its flow control methods for C&D materials.**

This section summarizes King County’s efforts to enforce flow control methods, city enforcement efforts, and available data on C&D diversion performance.

### **County Efforts to Enforce Flow Control Methods**

King County undertakes enforcement efforts related to its flow control methods for C&D materials to ensure compliance with its ordinances and achieve its recycling and waste diversion goals. These efforts combine regulatory mandates, inspections, penalties, routine enforcement, and legal action when necessary.

The Division Director is explicitly authorized and directed to enforce the KCC C&D waste provisions in accordance with applicable King County code provisions. This grants the County the legal power to act against violations. The DFAs with each of the designated C&D facilities provide SWD with the right to inspect and carry out other necessary functions at the designated C&D facility. The right to inspect/audit

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<sup>44</sup>Kenmore Municipal Code Chapter 15.20.135 [\[LINK\]](#)

<sup>45</sup>Kenmore Municipal Code Chapter 20.15 [\[LINK\]](#)

<sup>46</sup>Shoreline Municipal Code 15.05.017 [\[LINK\]](#)

relevant books and records is also included. These inspections are a primary tool for verifying compliance with waste delivery requirements and waste diversion plans.

Any person who violates KCC 10.30 or related rules is subject to enforcement and civil penalties as provided in KCC Title 23.<sup>47, 48</sup> The Division Director may seek legal or equitable relief (e.g., injunctions) to stop acts or practices that violate the C&D waste provisions, allowing the County to take court action to prevent ongoing noncompliance.

The County enforces flow control using six primary methods described in this section:

- Designated C&D waste transfer station reporting and inspections
- Mixed C&D designated facility reporting and inspections
- Demolition site inspections using permit data
- Jobsite verification of adherence to C&D requirements for projects requesting permission to directly haul to landfill/intermodal yard
- C&D residuals testing at mixed C&D facilities
- King County transfer station special waste monitoring and issuance of Unacceptable Waste Reports

### *Transfer Station Inspections*

#### King County-Owned Transfer Stations

The SWD Waste Stream Compliance & Enforcement team monitors the County's transfer stations to identify loads or materials that should have been delivered to other facilities. This includes loads containing C&D materials that arrive in a vehicle with a tip bed or tip trailer, which are not allowed.

#### Designated C&D Waste Transfer Facilities (privately owned)

Inspections of designated C&D waste transfer facilities are conducted quarterly by the SWD Health & Environmental Investigator (HEI) to ensure that loads are beneath the 20 percent banned material threshold and to enforce the Waste Ban Compliance Plan.

A designated C&D waste transfer facility's waste ban compliance plan must identify how all loads that exceed the Action Level Threshold of more than 20 percent recyclable C&D will be managed, including these potential actions:

- Transfer the load to a King County-designated C&D MRF
- Accept the load, then separate and divert banned materials from landfill disposal
- As a last resort, dispose of the load only when the waste cannot be transferred or recycled because reloading the waste would endanger workers or substantially disrupt facility operations

The facility's rationale for disposing of a load that meets or exceeds the Action Level Threshold must be recorded and retained in the facility's load inspection reporting sheet, which is sent to SWD every month.

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<sup>47</sup>KCC Chapter 10.30 [[LINK](#)]

<sup>48</sup>KCC Title 23 [[LINK](#)]

### Compliance Monitoring Strategy

The intent of C&D transfer station inspections is to have a monitoring system that identifies acceptable and unacceptable loads of C&D waste entering facilities. When transfer stations are visited, an Ongoing Monitoring Recording Sheet is filled out to document observations made during visual inspection of materials being unloaded (see Appendix C). Enforcement staff monitor incoming loads as they enter the facility as well as when they are dumped onto a working floor or pit. Observations are recorded and photographed as needed.

Records are reviewed and compared with observations made to confirm the validity of the reported figures. Monitoring records are kept and updated as observations occur. Any follow-up letters or warning letters are retained for record-keeping to ensure that facilities are applying disposal bans and other restrictions required under the DFA.

### Evaluation

The overall effectiveness of flow control and facility compliance is evaluated by monitoring recycling and disposal rates. The desired outcome is an increase in recycling rates and minimal leakage, which is defined as materials not being managed in accordance with regulations, either intentionally or accidentally. The HEI establishes annual goals for site visits and transfer station inspections during the yearly fourth quarter performance appraisal.

### *Mixed C&D Designated Facility Testing*

DFAs require annual residual testing, which analyzes how efficiently facilities are recovering banned materials from the waste stream and ensures that MRFs are not throwing away banned materials they are required to separate. To pass and stay in compliance, facilities must have no more than 10 percent of their processing residuals made up of banned materials. The sample of waste at a facility is used to gauge compliance for missed C&D recovery.

To remain in compliance with the DFA between the County and facility, the annual residual testing must be completed. If the facility is found to be out of compliance, a warning letter is issued. The designated facility has two subsequent attempts to pass the residual test; if it fails both attempts, the County can remove the facility from the list of approved material handling facilities.

A King County-designated C&D processing facility can pass the annual residual testing while having very low overall facility diversion rates if the facility is accepting large amounts of materials that are not recyclable and not on the list of C&D materials banned from landfill disposal.

### *Demolition Permit Site Visit Inspections*

Each city has its own permitting system, while unincorporated areas of King County are managed by the Permitting Division of the County's Department of Local Services. The SWD HEI can access the permits through an online database. Typically, they conduct 60 to 80 site visits per month, or 900-plus per year.

Peak demolition activities occur in the spring and summer. The County has a goal of visiting every site, but low-priority sites, such as parking lot demolitions, are occasionally left uninspected during peak months. Currently, the HEI is visiting 85 to 90 percent of the permitted demolition sites. City permits are typically available through the online database 11 to 12 days after they have been approved. This delay

in availability can sometimes mean that the demolition has already occurred before the HEI is aware the permit has been issued.

The standard operating procedure for demolition site visits is provided in Appendix D.

### City Efforts to Enforce Flow Control Methods

#### *Issaquah*

In Issaquah, enforcement of C&D requirements is established through permit conditions set by site or building inspectors and planners. However, enforcement is not currently being conducted and thus there are no data regarding enforcement actions.

#### *Redmond*

Redmond requires weight tickets from the designated facilities, showing tons delivered, and tickets for source-separated materials, shown by material. If weight tickets are not submitted, the demolition permit will not receive a final inspection. For construction projects, if weight tickets are not submitted, the permit will not receive final approval, which could preclude issuance of the project's occupancy permit. This enforcement is conducted by the building official as part of the permit process, similar to any other permit violation. The ordinance went into effect May 1, 2025, and there are, as yet, no enforcement data available.

#### *Kenmore*

In 2024, the City of Kenmore adopted the Washington Residential Code Appendix AWY regarding Construction and Demolition Material Management and Appendix AWZ, Building Deconstruction.<sup>49</sup> Enforcement is provided in KMC 1.20.010-020.<sup>50</sup>

The City states that in practice, enforcement is difficult because C&D materials are often already disposed of and cannot be tracked. The City withholds final inspection approval on the demolition permit until the required information is provided, but once a structure is removed, enforcement is challenging. The Building Official and Code Compliance Officer are responsible for enforcement. A correction notice is issued and, if there is no compliance, a Notice of Violation is issued. In the past three years, no enforcement actions have been taken.

#### *Shoreline*

Shoreline currently has no code enforcement for C&D waste. Building inspectors ensure that recycling bins are on site and enforce the requirements when they conduct on-site inspections, but they do not have the capacity to continuously monitor the location or the drop-off of materials. The waste diversion report must be filled out by the applicant and accepted prior to permit issuance or finalization, depending on the permit being applied for. As of mid-August 2025, no enforcement actions had been taken by the City.

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<sup>49</sup> Kenmore Municipal Code 15.20.120 [\[LINK\]](#)

<sup>50</sup> Kenmore Municipal Code 1.20.010-020 [\[LINK\]](#)

## C&D Diversion Performance Data

Based on 2021 countywide C&D data, 51.2 percent, or 508,265 tons, of C&D material delivered to King County-designated facilities were diverted, while 449,385 tons of C&D material were disposed. C&D recycling facilities (single-commodity facilities) receiving materials from King County achieved a 100 percent diversion rate in 2021, diverting 1,390,422 tons of C&D material and disposing of none.<sup>51</sup>

When totaled, the County achieved an 81 percent diversion rate in 2021, diverting 1,898,687 tons of C&D materials and disposing of 499,385 tons.

Of the total 1,898,687 tons of C&D materials diverted in 2021, 399,486 tons were reported to Ecology by companies that redacted their names and are listed simply as permitted MRFs. If the figures from these redacted reports sent to Ecology are from King County-designated facilities, the tonnage diverted would be lower (1,499,201) and would lower the 2021 diversion rate to 77 percent.

### B3. Findings from the evaluation of flow control compliance for C&D materials

Several areas of leakage, compliance gaps, and areas of noncompliance have been identified by the SWD HEI.

**Failure to use designated facilities:** The primary area of noncompliance is the disposal or delivery of mixed C&D materials or nonrecyclable C&D waste to facilities not designated by King County, or to facilities that are designated, but for a different waste type (e.g., loads that exceed the 20 percent recyclable content threshold delivered to C&D waste transfer stations). These may be identified through visiting permitted site demolition projects and talking to the contractors or following loads. In some cases, construction contractors collect C&D materials in intermodal freight containers at C&D jobsites so they can be hauled directly to railheads for transport to a landfill. This is allowed as long as they submit a waste diversion plan and a waste diversion report but this does not always occur.

While comprehensive data on the amount of King County's C&D waste delivered to nondesignated facilities outside the county is not available, Snohomish County conducted a study of out-of-county waste delivered to its transfer stations from August 2023 to January 2024.<sup>52</sup> During this period, cash and small account-holder business customer transactions of waste originating from King County added up to 7,863 tons and made up 71 percent of the out-of-county waste delivered to Snohomish County facilities. C&D waste made up 76 percent of the out-of-county waste delivered to Snohomish County, although the study did not attribute these materials to specific source locations.

**Inability to inspect demolition sites:** There is often a delay of 10 to 12 days in filing the demolition permits online after they have been approved by a jurisdiction. Thus, a portion of the demolition projects cannot be inspected because they are completed before the SWD HEI is aware of them. Some permitting jurisdictions do not require demolition permits and some jurisdictions permits are not available through the online permit database.

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<sup>51</sup> King County Solid Waste Division (2025). Construction & Demolition Diversion Data. Compiled from Washington State Department of Ecology input (unpublished internal dataset).

<sup>52</sup> Snohomish County, Snohomish County SW ID Verify: Data Report Update, August 202 -January 2024, no date.

**Noncompliance with waste diversion plans approved for landfill direct disposal:** Generators may fail to separate readily recyclable materials as outlined in their approved waste diversion plan.

**Lack of required documentation for projects approved for landfill direct disposal:** Failure to submit waste diversion reports or accompanying receipts from designated facilities would indicate a compliance gap, preventing the County from verifying proper disposal.

**Inappropriate use of King County transfer station C&D exemption:** King County code allows County transfer stations to accept "small quantities of C&D waste" if loads are "transported by vehicles or trailers that do not have mechanized dump beds, either hydraulic or otherwise."<sup>53</sup> This has led to large loads of C&D material being brought to the transfer stations in large panel vans and moving trucks.

**Improper on-site practices:** Commingling of recyclable C&D materials and nonrecyclable C&D materials at jobsites could lead to improper disposal.

**Commercial C&D misuse of MSW collection containers:** Some amount of C&D material gets put into multifamily dumpsters during remodeling. This waste is then hauled to a King County transfer station and goes through the MSW system to Cedar Hills Regional Landfill. The HEI has indicated that this material quantity is cumulatively thought to be larger than the small home remodel allowance would allow.

#### **B4. Recommended actions and policies the county could take to improve flow control compliance for C&D materials**

Recommendations are based on insights from the inventory, enforcement summary, findings on compliance, and a literature review.

It is important to note that these are preliminary recommendations based on research and analysis. Pursuit or adoption of actions and policies would be based on community and industry engagement, feedback, and analysis, as well as equity impact review.

#### **Consultation**

- Consult with C&D contractors to gather feedback on operational challenges, clarity of regulations, and the feasibility of compliance methods.
- Consult with waste haulers to understand logistical challenges, impacts of flow control on routes, and suggestions for improving waste characterization and reporting.
- Consult with C&D receiving facilities by soliciting input on challenges in accepting and processing C&D loads, effectiveness of waste bans, and suggestions for improving load quality and compliance reporting.

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<sup>53</sup>KCC 10.30.020. E [[LINK](#)]

- Partner with the Master Builders Association, designated facility operators, the Building Industry Association of Washington, regulators, and other industry entities to identify effective flow control methods.

### **Actions and Policies**

- Work with cities to gain faster notification of demolition permits, allowing more demolition sites to be inspected by the County prior to demolition.
- Require deconstruction (instead of demolition) for King County-owned buildings.
- Require building salvage assessments for all King County-owned buildings that are approved for remodeling or removal (demolition/deconstruction).
- Encourage deconstruction (instead of demolition) in all permitting jurisdictions for select project sizes and/or project types to increase C&D debris recovery.
- Encourage adoption of state building code appendices P, Y, and Z (pertinent to C&D and deconstruction) by all permitting jurisdictions. Alternatively, advocate that the State Building Code Council move these appendices to be standard code language, requiring adoption rather than being voluntary.
- Require C&D plans to be submitted for all demolition permits in unincorporated King County and allow time for SWD review before demolition permits become active. These requirements will go into effect if the current Building Code adoption package (which includes the state building code Appendices P and Y) is approved.
- Require jobsite separation of C&D recyclables from C&D nonrecyclable waste.
- Require the use of cloud-based C&D reporting software for all permitted demolition projects in King County.

### **Literature Review**

- Conduct regular literature reviews encompassing academic research, industry best practices, and reports from other leading jurisdictions regarding C&D waste management, flow control efficacy, and innovative recycling technologies.
- Explore regulatory structures, enforcement strategies, and incentive programs used elsewhere.
- Investigate studies of how different fee structures, communication strategies, and compliance frameworks influence generator and hauler behavior.

### **Outreach and Communication**

- Focus on improving communication and refining incentives for compliance with flow control provisions.

- Create easy-to-access online resources to make it easier for haulers and C&D site contractors to find information relevant to their specific situation (e.g., what ordinances apply to them and why, what specific steps must be taken to maintain compliance).
- Publicize the consequences for noncompliance clearly, so that haulers and site contractors understand what specific fines may be levied and actions taken for noncompliance.
- Increase engagement with industry leaders and other jurisdictions.
- Increase engagement with vendors on enforcement strategies, through mechanisms, such as an enforcement advisory group or additional outreach efforts.

## VI. Conclusion

The C&D flow control analysis and enforcement report provides an assessment of the comprehensive approach the King County Solid Waste Division has taken regarding flow control of C&D materials, as well as strategies to make flow control compliance even stronger.

The purpose of flow control is for jurisdictions to exercise the authority and responsibility to ensure proper disposal of waste materials generated within their jurisdiction, thereby protecting human health and the environment. The County's C&D flow control system has been deliberately established and maintained to ensure that nonrecyclable C&D waste material is properly disposed of. It should be noted that flow control authority only extends to the C&D materials that should be disposed of in a fully permitted MSW landfill, whether in loads of mixed recyclables and nonrecyclables or in loads with only nonrecyclable C&D waste.

Overall, further improvements can be made to prevent the delivery and disposal of mixed C&D materials or nonrecyclable C&D waste to facilities not designated by King County. There are potentially thousands of tons being routed to facilities that are not in compliance with recycling and disposal requirements. The inability to timely inspect demolition sites creates another gap in the process. The 10- to 12-day delay between issuance of permits and permit notifications means that demolition projects are often completed before inspections can be conducted.

While the County's flow control strategy is robust, additional steps could be taken to strengthen it. These include:

- **Consultation** - Consult with C&D contractors to gather feedback on operational challenges, clarity of regulations, and the feasibility of compliance methods.
- **Actions and policies** - Work with cities to achieve faster notification of demolition permits, allowing more sites to be inspected by the County prior to demolition.
- **Literature review** - Conduct regular literature reviews encompassing academic research, industry best practices, and reports from other leading jurisdictions regarding C&D waste management, flow control efficacy, and innovative recycling technologies.
- **Outreach and communication** - Focus on improving communication and refining incentives for compliance with flow control provisions.

These efforts align with the ongoing process-improvement efforts the C&D program has planned, with the C&D fee increase providing needed resources.

The 2025 Strategic Climate Action Plan includes C&D-related efforts that will continue to emphasize the circular economy and zero waste of resources; also included is improved performance for County-owned capital projects to achieve high C&D diversion rates, require salvage and deconstruction assessments, and incorporate better training and procurement methods.

The Division hopes to further evaluate and pursue these opportunities. Increased collaboration and engagement with the community and industry is needed to identify the most effective strategies to strengthen flow control and increase the diversion of C&D materials from landfills and back into the circular economy.

## **VII. Appendices**

Appendix A---Accepted Materials

Appendix B—C&D Facility Reporting

Appendix C—Ongoing Monitoring Recording Sheet

Appendix D—Demolition Site Visit Standard Operating Procedure

### *King County Code Accepted Materials and Performance Requirements*

This appendix presents specific ordinance language from the Designated Facility Agreement originally in Ordinance 18166 and revised in Ordinance 19347 that describes what materials are accepted at each facility and the performance requirements that C&D Materials Recovery Facilities (MRFs) must achieve.

**Definitions (Construction and Demolition Waste):** “Construction and Demolition (C&D) Waste” means any nonputrescible recyclable or nonrecyclable waste that results from construction, remodeling, repair, or demolition of buildings, roads, or other structures, and requires removal from the site of construction or demolition.

**County’s Designation of Facility and Permittee’s Right and Obligation to Accept C&D Waste:** Pursuant to K.C.C. 10.08.020, King County permits the Permittee and designates the Facility to accept C&D Waste. The Permittee shall accept C&D Waste unless:

- (1) capacity constraints at the Facility will be exceeded
- (2) the customer has previously failed to exclude Unacceptable Waste,
- (3) the customer has previously failed to pay invoices,
- (4) for MRFs, the C&D Waste is too contaminated, such as it contains excessive levels of garbage or wet materials that would preclude Processing by the Facility, or
- (5) for MRFs, the C&D Waste contains excessive levels of materials that are not accepted by the Facility for Processing.
- (6) for Intermodal Facilities and Landfills qualifying as C&D Receiving Facilities, the Eligible C&D Demolition Project sending the C&D Waste fails to meet the conditions specified in Section 8 (of the Designated Facility Agreement).

**Definitions (Unacceptable Waste):** “Unacceptable Waste” means any material for which the transportation or disposal would constitute a violation of any governmental requirement pertaining to health, safety, or the environment. The material may include, but is not limited to, hazardous waste, extremely hazardous or dangerous waste as designated under Washington state or federal law, including, but not limited to, regulations contained in the Washington Administrative Code, now in effect or as may be hereafter amended, or in the Code of Federal Regulations, now in effect or as may be hereafter amended.

**Unacceptable Waste:** The Permittee shall not accept Unacceptable Waste at the Facility.

**Materials Banned From Disposal:** The Permittee shall not dispose of or accept at Landfills C&D Waste containing Recyclable C&D Waste materials currently specified by the Director of the Division and published as the “Director’s List of Readily Recyclable Construction and Demolition Materials Banned from Disposal” (“Director’s List”) on the Division website, apart from exceptions noted in the Director’s List or this Agreement. [...] This List may be revised by the Director based on

current market conditions. Such revisions shall apply to this Agreement, but only after the Division has consulted with and notified the Permittee of the revisions.

**Material Recovery Requirements at C&D MRFs:** The Permittee shall use its best efforts to Process or divert Recyclable C&D Waste material received prior to disposing of residuals at Landfills. The Permittee may not dispose at landfills any load of C&D Waste that contains more than 10 percent by total combined weight of those materials listed in the Director’s List. The Division shall have the right to access, inspect, and sample from Residual streams at the end of all MRF Processing lines, as well as materials diverted for Landfill disposal prior to Processing to monitor compliance with recycling requirements and to ensure that the materials listed in the Director’s List are being handled in compliance with Section 12.

**Exhibit A: Director’s List of Readily Recyclable Construction and Demolition (C&D) Materials Banned from Disposal at a Landfill:** All generators, handlers, and collectors of mixed and nonrecyclable C&D Waste generated within the jurisdiction of King County shall deliver or ensure delivery to a designated C&D receiving facility. The following C&D Waste disposal bans apply to generators, handlers, collectors, and privately and publicly owned facilities designated by King County to manage C&D Waste, as authorized under King County Code Title 10:

As of January 1, 2016, the following materials are banned from disposal:

- a. Concrete, asphalt paving and bricks, unpainted, without a hazardous constituent, and not attached to other materials.
- b. Metal, ferrous and nonferrous—includes composite, multi-metal products or products with nonmetal contaminants but metal content must be more than 90 percent by weight of the material.
- c. Cardboard—includes with tape, staples, and other fasteners and is dry and free of contamination, such as paint, grease, grime, or dirt.
- d. Unpainted new construction gypsum scrap that is dry and does not have adhering spackling compound or excessive water damage that would prevent recycling.
- e. Unpainted/untreated wood—excludes particle board and laminated veneer wood.

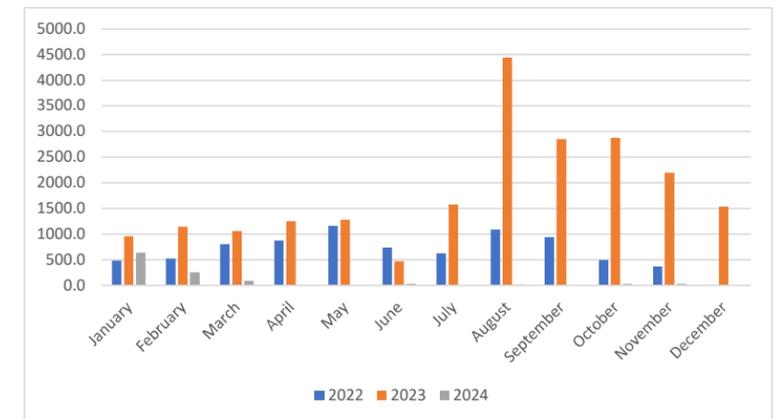
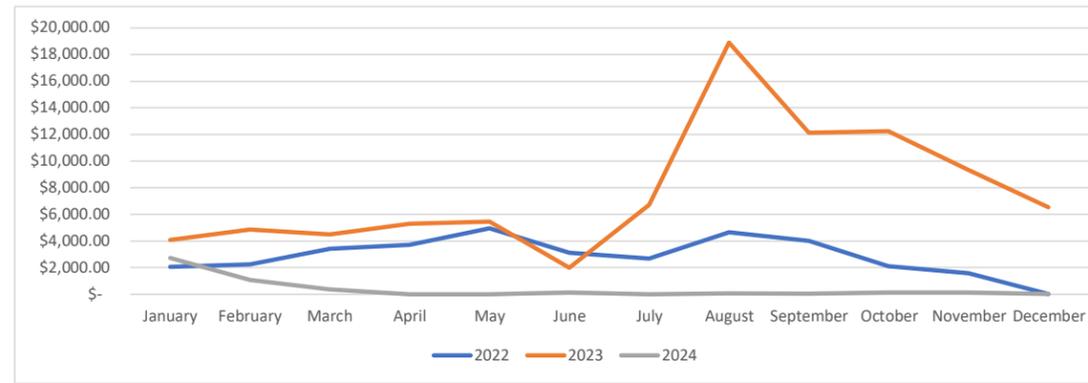
Exceptions:

- a. Bans do not apply where C&D Wastes are painted; have hazardous or asbestos containing constituents; are glued, nailed, or otherwise connected to other materials; are present only in very small quantities; or are generated during disaster emergency situations where disaster debris needs to be removed quickly and recycling options are not available.
- b. Waste residual from designated C&D Material Recovery Facilities (MRFs) may contain up to 10 percent by total combined weight of the materials listed above, based on the sampling methodology specified in the King County C&D MRF Waste Residual Sampling Protocol.

## Appendix B: C&D Facility Reporting

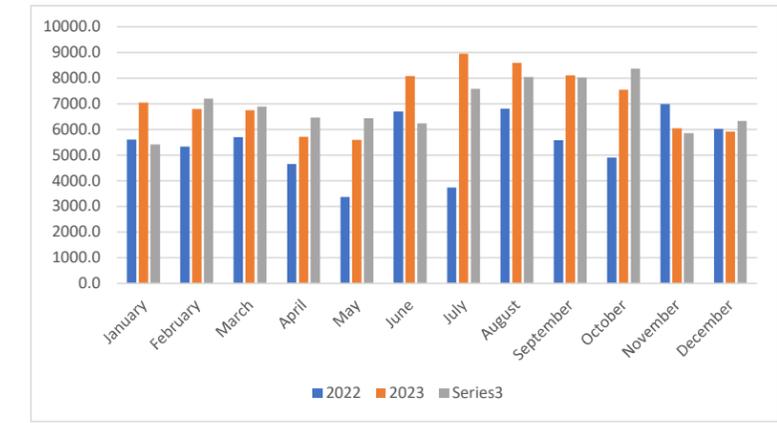
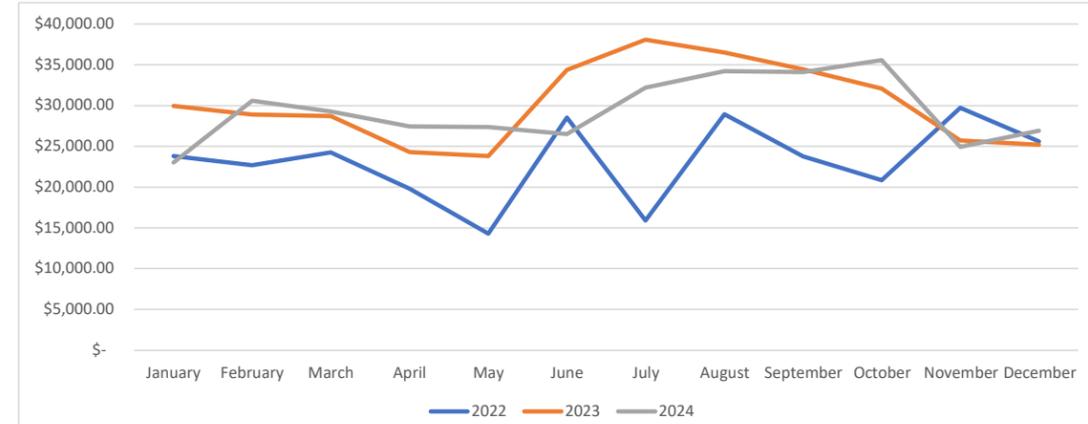
### DTG Maltby

	2022		2023		2024	
	revenue	tonnage	revenue	tonnage	revenue	tonnage
January	\$ 2,067.07	486.4	\$ 4,084.80	961.12941	\$ 2,717.71	639.46
February	\$ 2,241.66	527.4	\$ 4,843.64	1139.68	\$ 1,071.77	252.18
March	\$ 3,426.82	806.3	\$ 4,503.64	1059.68	\$ 372.34	87.61
April	\$ 3,706.60	872.1	\$ 5,308.68	1249.1012	\$ 5.74	1.35
May	\$ 4,953.46	1165.5	\$ 5,442.17	1280.5106	\$ -	0.00
June	\$ 3,131.57	736.8	\$ 1,998.35	470.2	\$ 143.31	33.72
July	\$ 2,665.22	627.1	\$ 6,719.63	1581.0894	\$ -	0.00
August	\$ 4,642.62	1092.4	\$ 18,902.94	4447.7506	\$ 73.31	17.25
September	\$ 4,006.31	942.7	\$ 12,118.79	2851.48	\$ 41.31	9.72
October	\$ 2,093.21	492.5	\$ 12,240.94	2880.2212	\$ 140.38	33.03
November	\$ 1,564.30	368.1	\$ 9,324.20	2193.9294	\$ 137.15	32.27
December	\$ 8.33	2.0	\$ 6,537.52	1538.24	\$ 16.28	3.83
					\$ 4,719.30	1110.42



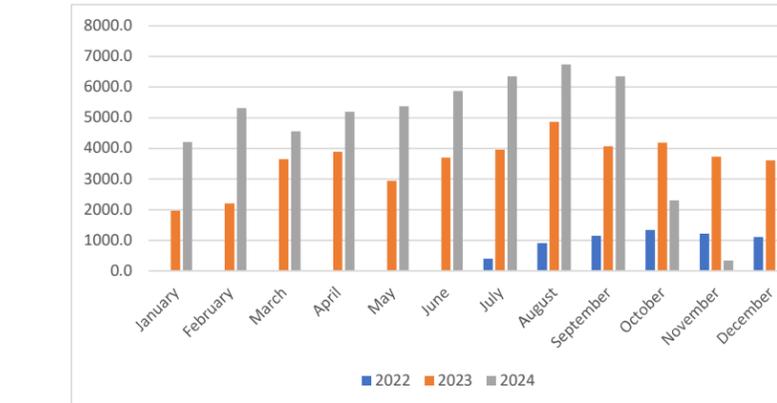
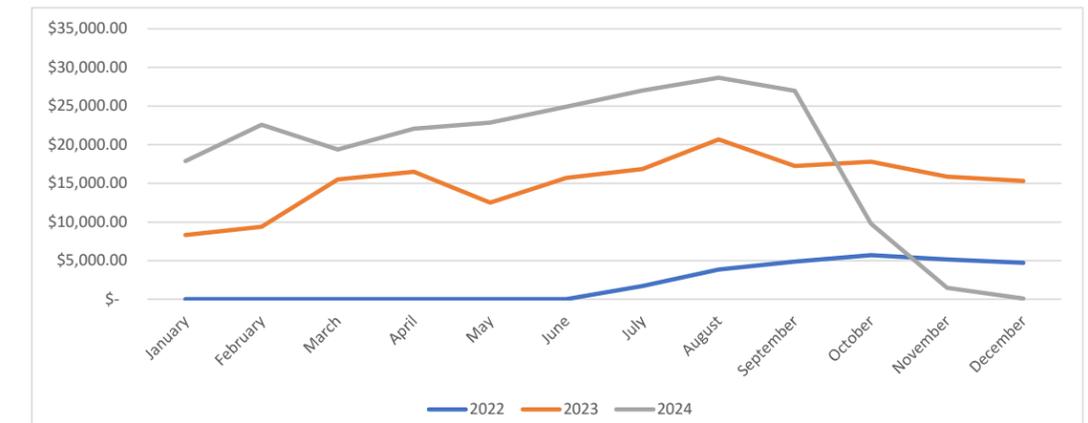
### DTG Renton

	2022		2023		2024	
	revenue	tonnage	revenue	tonnage	revenue	tonnage
January	\$ 23,819.98	5604.7	\$ 29,931.48	7042.7	\$ 23,035.38	5420.1
February	\$ 22,680.21	5336.5	\$ 28,916.53	6803.9	\$ 30,590.91	7197.9
March	\$ 24,258.41	5707.9	\$ 28,704.84	6754.1	\$ 29,282.93	6890.1
April	\$ 19,803.13	4659.6	\$ 24,300.01	5717.6	\$ 27,468.73	6463.2
May	\$ 14,313.79	3368.0	\$ 23,799.02	5599.8	\$ 27,371.66	6440.4
June	\$ 28,503.99	6706.8	\$ 34,386.45	8090.9	\$ 26,512.73	6238.3
July	\$ 15,900.14	3741.2	\$ 38,080.38	8960.1	\$ 32,221.80	7581.6
August	\$ 28,928.09	6806.6	\$ 36,520.04	8593.0	\$ 34,214.50	8050.5
September	\$ 23,768.68	5592.6	\$ 34,469.92	8110.6	\$ 34,093.67	8022.0
October	\$ 20,858.19	4907.8	\$ 32,073.90	7546.8	\$ 35,549.89	8364.7
November	\$ 29,734.02	6996.2	\$ 25,718.92	6051.5	\$ 24,921.07	5863.8
December	\$ 25,593.50	6022.0	\$ 25,194.81	5928.2	\$ 26,908.62	6331.4
					\$ 352,171.89	82863.97



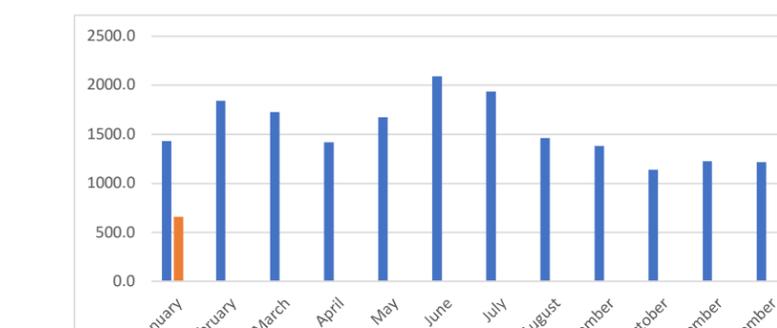
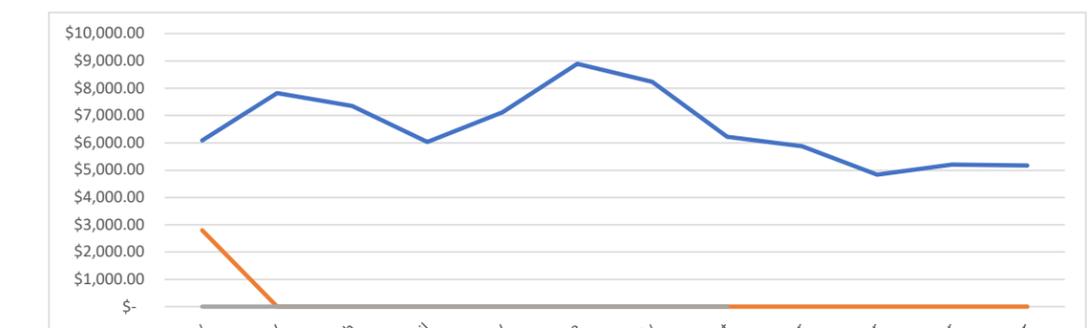
### DTG Redmond

	2022		2023		2024	
	revenue	tonnage	revenue	tonnage	revenue	tonnage
January	\$ -	0.0	\$ 8,320.82	1957.8	\$ 17,872.40	4205.3
February	\$ -	0.0	\$ 9,360.07	2202.4	\$ 22,583.40	5313.7
March	\$ -	0.0	\$ 15,521.77	3652.2	\$ 19,385.06	4561.2
April	\$ -	0.0	\$ 16,531.40	3889.7	\$ 22,080.15	5195.3
May	\$ -	0.0	\$ 12,516.76	2945.1	\$ 22,864.62	5379.9
June	\$ -	0.0	\$ 15,702.26	3694.6	\$ 24,941.59	5868.6
July	\$ 1,703.53	400.8	\$ 16,840.63	3962.5	\$ 27,015.34	6356.6
August	\$ 3,850.12	905.9	\$ 20,706.38	4872.1	\$ 28,666.08	6745.0
September	\$ 4,849.42	1141.0	\$ 17,268.56	4063.2	\$ 26,980.53	6348.4
October	\$ 5,691.52	1339.2	\$ 17,809.67	4190.5	\$ 9,776.40	2300.3
November	\$ 5,154.70	1212.9	\$ 15,863.13	3732.5	\$ 1,447.89	340.7
December	\$ 4,726.51	1112.1	\$ 15,319.76	3604.6	\$ 70.08	16.5



### DTG Woodinville

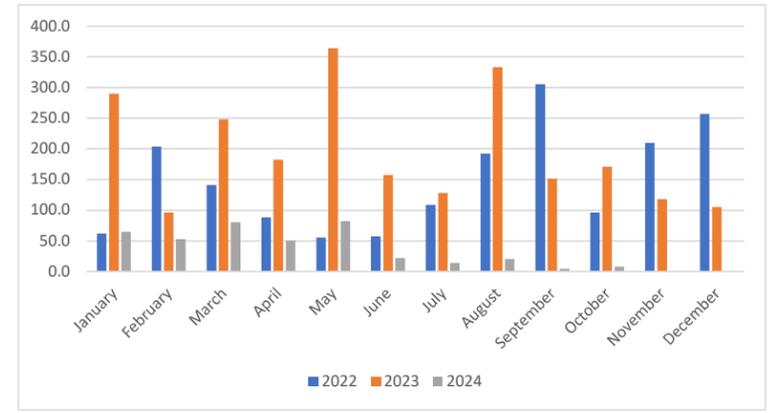
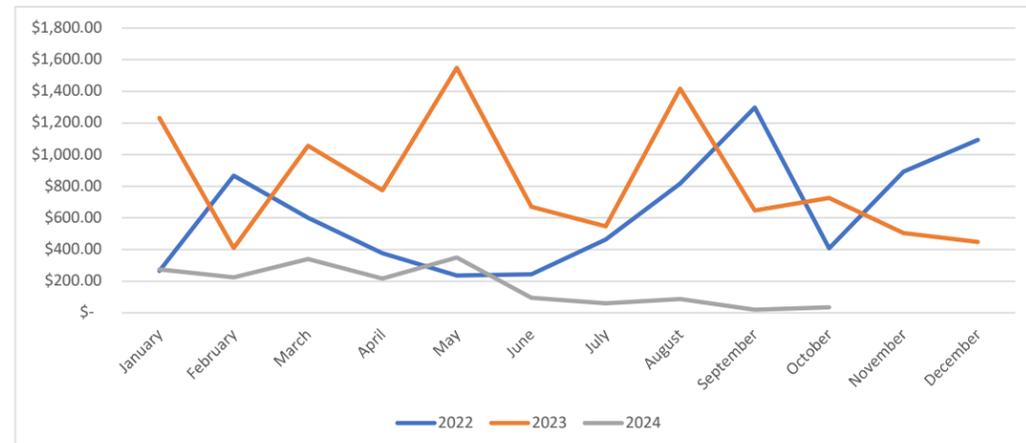
	2022		\$ 2,023.00		2024	
	revenue	tonnage	revenue	tonnage	revenue	tonnage
January	\$ 6,089.40	1432.8	\$ 2,796.25	657.9	\$ 1.91	0.4
February	\$ 7,827.69	1841.8	\$ 2.72	0.6	\$ -	0.0
March	\$ 7,347.66	1728.9	\$ -	0.0	\$ -	0.0
April	\$ 6,030.58	1419.0	\$ -	0.0	\$ -	0.0
May	\$ 7,124.32	1676.3	\$ -	0.0	\$ -	0.0
June	\$ 8,900.52	2094.2	\$ -	0.0	\$ -	0.0
July	\$ 8,234.76	1937.6	\$ -	0.0	\$ -	0.0
August	\$ 6,219.92	1463.5	\$ -	0.0	\$ -	0.0
September	\$ 5,878.94	1383.3	\$ -	0.0	\$ -	0.0



October	\$ 4,835.52	1137.8	\$ -	0.0	\$ -	0.0
November	\$ 5,207.14	1225.2	\$ -	0.0	\$ -	0.0
December	\$ 5,176.12	1217.9	\$ -	0.0	\$ -	0.0

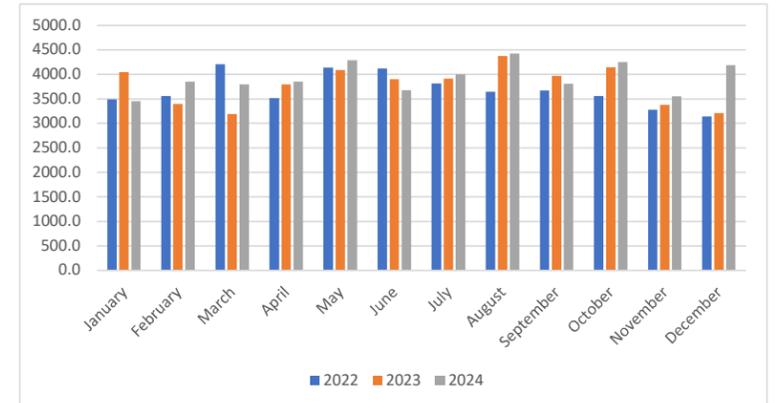
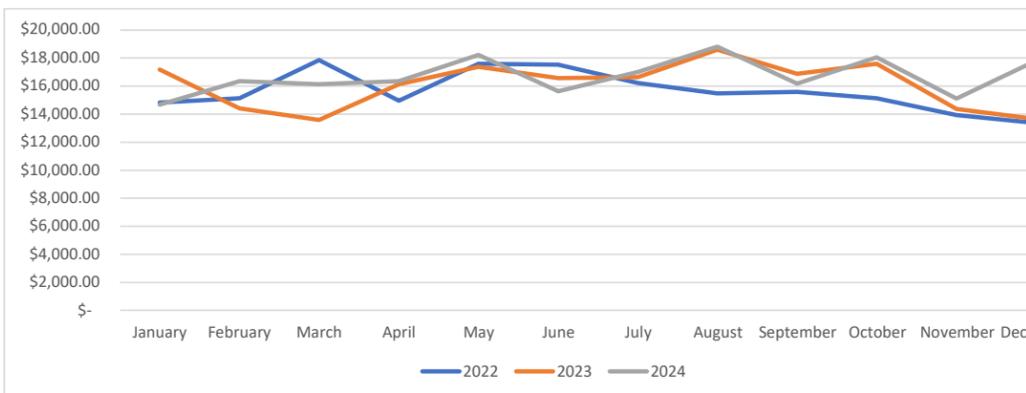
**Recovery 1**

	2022		2023		2024	
	revenue	tonnage	revenue	tonnage	revenue	tonnage
January	\$ 264.01	62.1	\$ 1,231.44	289.8	\$ 274.68	64.6
February	\$ 867.64	204.2	\$ 409.96	96.5	\$ 225.12	53.0
March	\$ 600.27	141.2	\$ 1,055.49	248.4	\$ 340.51	80.1
April	\$ 376.08	88.5	\$ 775.80	182.5	\$ 215.94	50.8
May	\$ 236.05	55.5	\$ 1,548.88	364.4	\$ 349.14	82.2
June	\$ 243.91	57.4	\$ 669.42	157.5	\$ 94.48	22.2
July	\$ 462.32	108.8	\$ 545.91	128.4	\$ 59.42	14.0
August	\$ 817.45	192.3	\$ 1,416.40	333.3	\$ 87.00	20.5
September	\$ 1,298.08	305.4	\$ 645.53	151.9	\$ 18.96	4.5
October	\$ 408.81	96.2	\$ 727.39	171.2	\$ 35.06	8.2
November	\$ 891.91	209.9	\$ 503.50	118.5	\$ -	0.0
December	\$ 1,093.91	257.4	\$ 447.02	105.2	\$ -	0.0



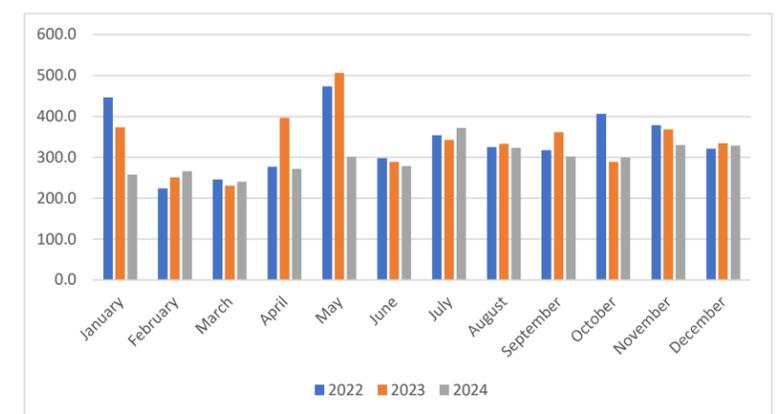
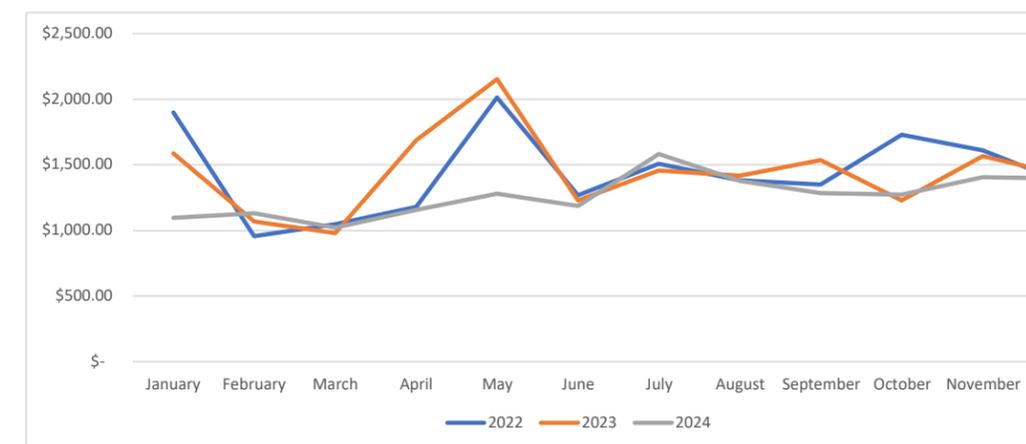
**Republic Black River**

	2022		2023		2024	
	revenue	tonnage	revenue	tonnage	revenue	tonnage
January	\$ 14,838.75	3491.5	\$ 17,178.16	4041.9	\$ 14,668.54	3451.4
February	\$ 15,127.96	3559.5	\$ 14,427.26	3394.6	\$ 16,364.75	3850.5
March	\$ 17,863.73	4203.2	\$ 13,572.55	3193.5	\$ 16,144.35	3798.7
April	\$ 14,961.87	3520.4	\$ 16,123.74	3793.8	\$ 16,362.08	3849.9
May	\$ 17,590.71	4139.0	\$ 17,378.21	4089.0	\$ 18,235.31	4290.7
June	\$ 17,518.03	4121.9	\$ 16,573.60	3899.7	\$ 15,632.10	3678.1
July	\$ 16,220.70	3816.6	\$ 16,634.20	3913.9	\$ 17,009.82	4002.3
August	\$ 15,486.41	3643.9	\$ 18,605.86	4377.8	\$ 18,815.64	4427.2
September	\$ 15,591.30	3668.5	\$ 16,873.10	3970.1	\$ 16,177.16	3806.4
October	\$ 15,134.08	3561.0	\$ 17,600.74	4141.4	\$ 18,055.74	4248.4
November	\$ 13,941.45	3280.3	\$ 14,369.68	3381.1	\$ 15,098.68	3552.6
December	\$ 13,362.30	3144.1	\$ 13,648.11	3211.3	\$ 17,812.05	4191.1



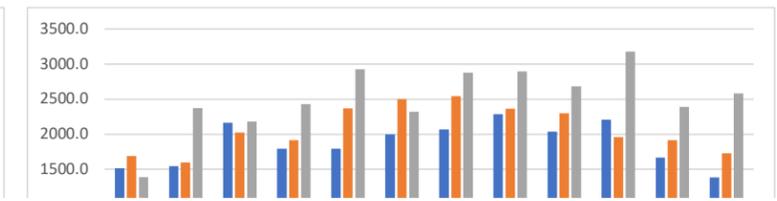
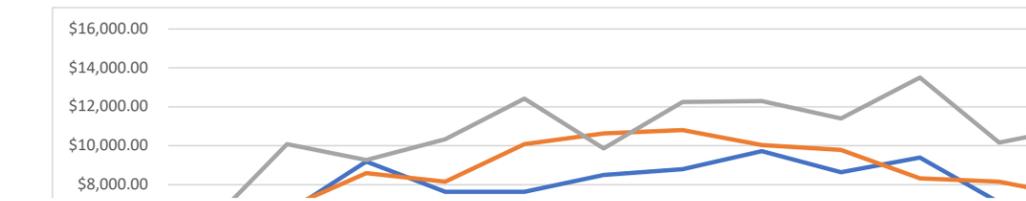
**WM Eastmont**

	2022		2023		2024	
	revenue	tonnage	revenue	tonnage	revenue	tonnage
January	\$ 1,900.94	447.3	\$ 1,586.78	373.4	\$ 1,095.40	257.7
February	\$ 955.61	224.8	\$ 1,068.24	251.4	\$ 1,132.16	266.4
March	\$ 1,047.07	246.4	\$ 980.69	230.8	\$ 1,022.42	240.6
April	\$ 1,179.29	277.5	\$ 1,688.78	397.4	\$ 1,156.64	272.2
May	\$ 2,014.46	474.0	\$ 2,154.07	506.8	\$ 1,280.53	301.3
June	\$ 1,268.41	298.4	\$ 1,229.65	289.3	\$ 1,187.49	279.4
July	\$ 1,507.52	354.7	\$ 1,458.26	343.1	\$ 1,581.77	372.2
August	\$ 1,381.46	325.0	\$ 1,417.25	333.5	\$ 1,378.32	324.3
September	\$ 1,349.97	317.6	\$ 1,536.16	361.4	\$ 1,284.18	302.2
October	\$ 1,728.26	406.6	\$ 1,230.04	289.4	\$ 1,272.58	299.4
November	\$ 1,611.30	379.1	\$ 1,566.51	368.6	\$ 1,404.33	330.4
December	\$ 1,368.67	322.0	\$ 1,422.56	334.7	\$ 1,397.91	328.9

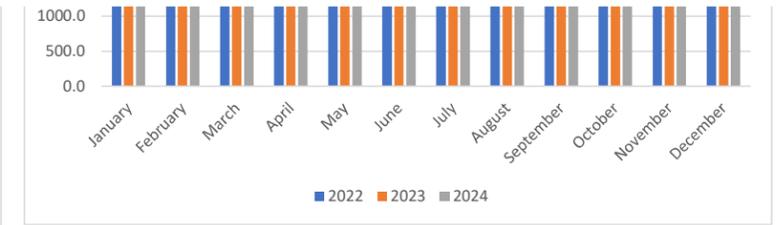
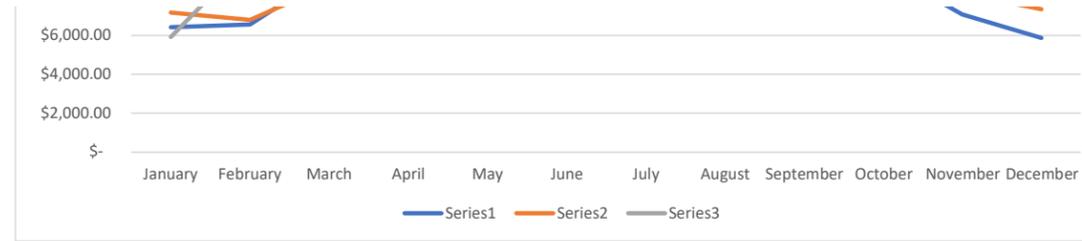


**WM RNW**

	2022		2023		2024	
	revenue	tonnage	revenue	tonnage	revenue	tonnage
January	\$ 6,421.03	1510.8	\$ 7,166.90	1686.3	\$ 5,909.84	1390.6
February	\$ 6,567.02	1545.2	\$ 6,788.14	1597.2	\$ 10,082.23	2372.3
March	\$ 9,188.12	2161.9	\$ 8,590.70	2021.3	\$ 9,261.01	2179.1
April	\$ 7,625.90	1794.3	\$ 8,146.66	1916.9	\$ 10,322.57	2428.8
May	\$ 7,622.46	1793.5	\$ 10,068.59	2369.1	\$ 12,430.23	2924.8

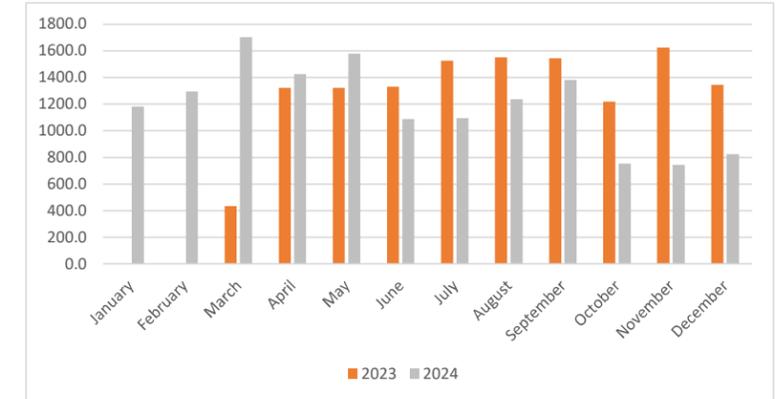
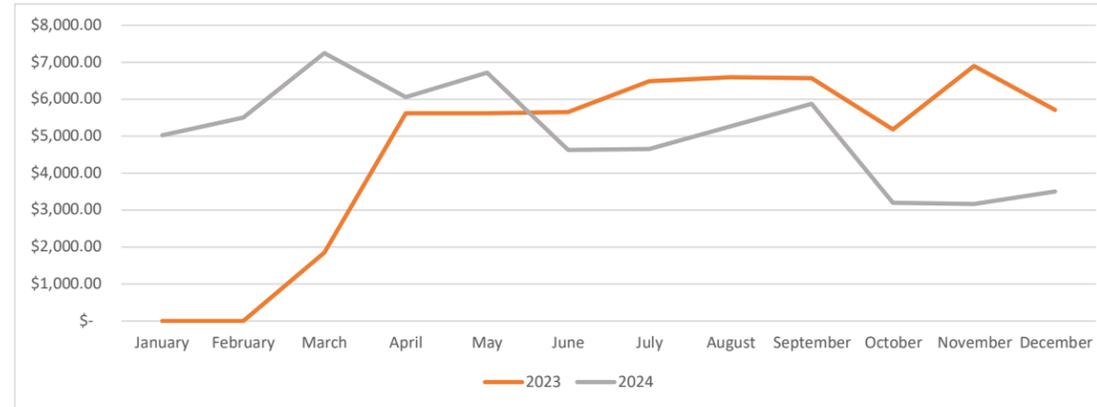


June	\$ 8,490.74	1997.8	\$ 10,621.47	2499.2	\$ 9,853.24	2318.4
July	\$ 8,790.96	2068.5	\$ 10,798.83	2540.9	\$ 12,241.83	2880.4
August	\$ 9,712.44	2285.3	\$ 10,037.57	2361.8	\$ 12,293.81	2892.7
September	\$ 8,642.16	2033.4	\$ 9,779.12	2301.0	\$ 11,394.68	2681.1
October	\$ 9,380.60	2207.2	\$ 8,321.50	1958.0	\$ 13,504.50	3177.5
November	\$ 7,075.83	1664.9	\$ 8,144.57	1916.4	\$ 10,157.67	2390.0
December	\$ 5,875.50	1382.5	\$ 7,340.81	1727.2	\$ 10,968.02	2580.7



**WM NS**

	2022		2023		2024	
	revenue	tonnage	revenue	tonnage	revenue	tonnage
January	\$ -	0.0	\$ 5,027.24	1182.9	\$ -	0.0
February	\$ -	0.0	\$ 5,503.28	1294.9	\$ -	0.0
March	\$ 1,846.58	434.5	\$ 7,243.96	1704.5	\$ 1,846.58	434.5
April	\$ 5,625.05	1323.5	\$ 6,059.65	1425.8	\$ 5,625.05	1323.5
May	\$ 5,615.91	1321.4	\$ 6,715.85	1580.2	\$ 5,615.91	1321.4
June	\$ 5,657.86	1331.3	\$ 4,623.96	1088.0	\$ 5,657.86	1331.3
July	\$ 6,484.31	1525.7	\$ 4,655.28	1095.4	\$ 6,484.31	1525.7
August	\$ 6,598.89	1552.7	\$ 5,262.90	1238.3	\$ 6,598.89	1552.7
September	\$ 6,569.74	1545.8	\$ 5,877.50	1382.9	\$ 6,569.74	1545.8
October	\$ 5,181.81	1219.2	\$ 3,197.87	752.4	\$ 5,181.81	1219.2
November	\$ 6,903.57	1624.4	\$ 3,161.62	743.9	\$ 6,903.57	1624.4
December	\$ 5,711.36	1343.8	\$ 3,504.08	824.5	\$ 5,711.36	1343.8





The following are steps given in the standard operating procedure (SOP) for employees conducting demolition site visits<sup>1</sup>

- 1. Project Identification:** Staff download lists of recently approved demolition permits to identify active projects that are likely to be under way. This ensures proactive monitoring.
  - 2. Planning & Coordination:** Weekly meetings with a supervisor cover project details, potential issues, and scheduling of site visits. This keeps the team informed and ensures staff safety in the field.
  - 3. On-Site Conduct & Documentation:**
    - a. Inspectors wear required personal protective equipment for safety and visibility.
    - b. They use camera phones to document observations, including the time and location of visits. Photos of alleged violations are crucial evidence for potential enforcement action.
    - c. Staff attempt to make eye contact and communicate with contractors using nonverbal cues to initiate conversations about waste management.
  - 4. Waste Tracking (Surveillance):** If necessary, staff may follow loads of suspected C&D waste from a project site to its final destination (designated or unauthorized facilities). This is a critical evidence-gathering step to determine if a Title 10 violation has occurred, especially if the waste is sent outside King County.
- Post-Visit Actions:** After visits, staff complete an inventory of observations, noting trends and collecting data for the annual SWD report. They also notify their supervisor of visit completion for safety assurance.

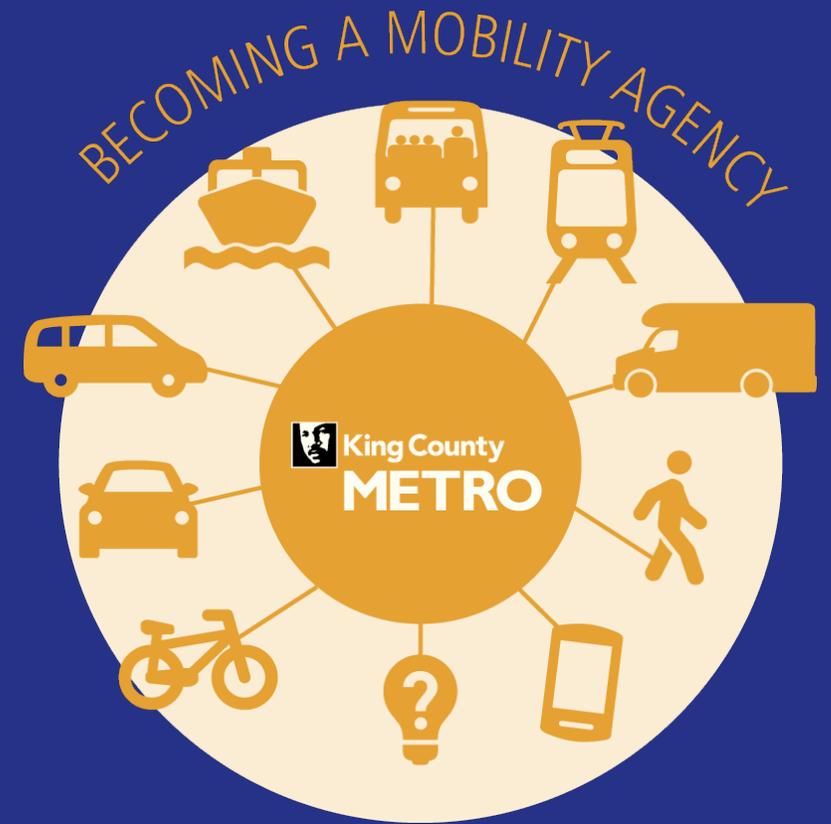
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<sup>1</sup> King County Solid Waste Division RES Section – C&D Team, “Job Breakdown Worksheet for C&D Site Visits: Monitor Demolition Projects within KC Jurisdiction,” May 8, 2024.

# South Link Connections Mobility Project

Transportation, Economy, and Environment  
Committee

February 17, 2026



# Agenda

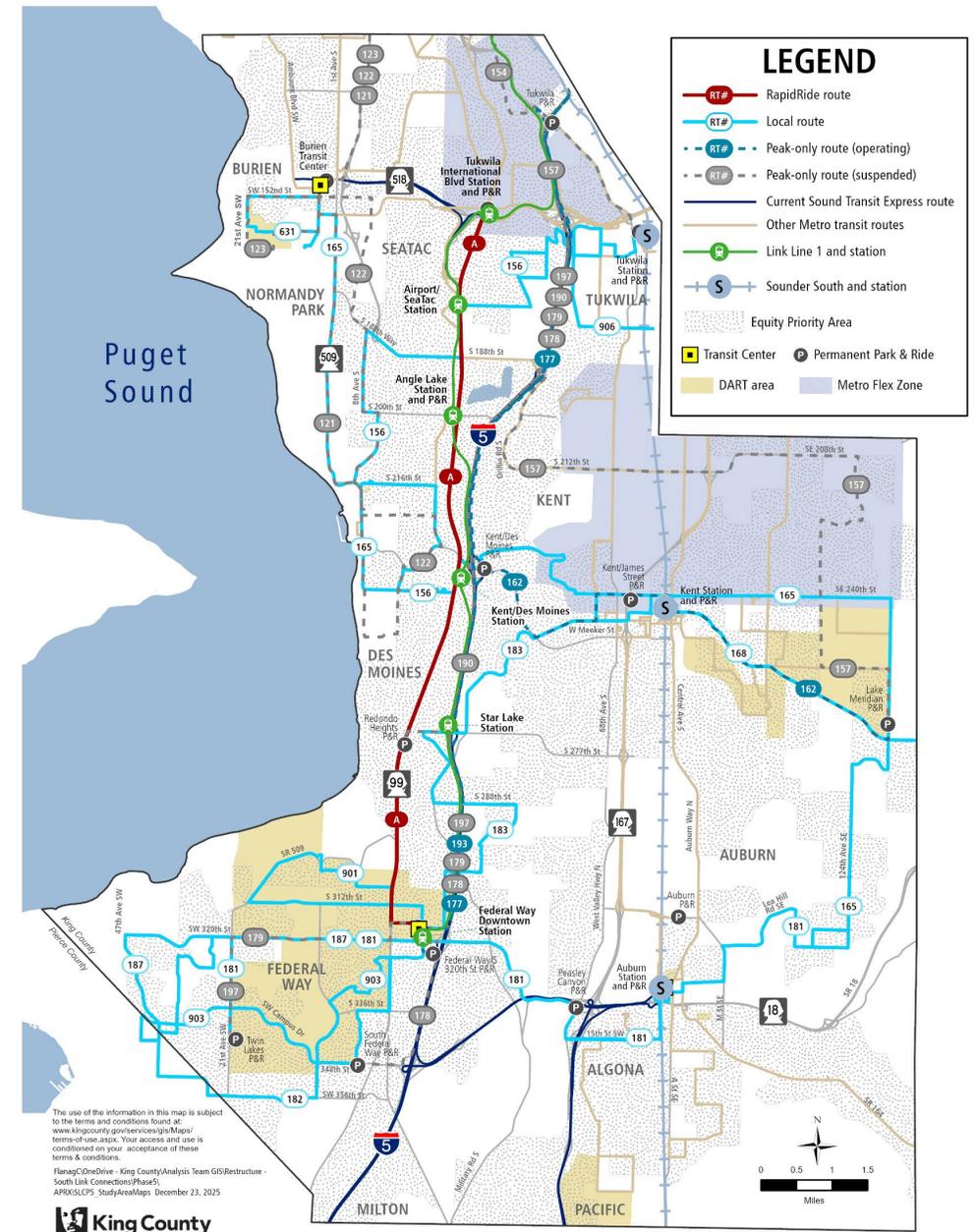
1. Project background
2. Recap of engagement
3. Final network proposal highlights
4. Implementation timeline

# Project Background and Scope

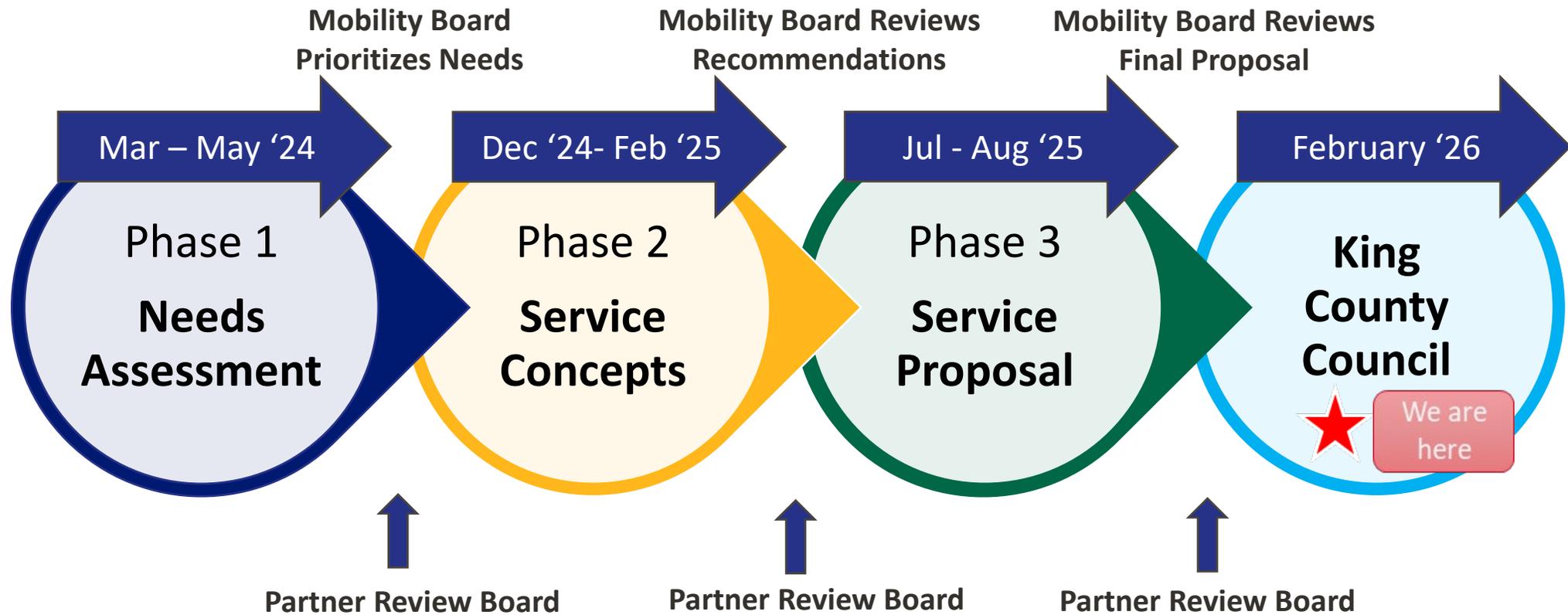
The South Link Connections project proposes updates to Metro's network in alignment with Sound Transit's Federal Way Link Extension.

- Project area covers 10 jurisdictions and portions of unincorporated King County.
- Project scope: 23 routes, including 9 suspended peak-only routes.
  - This project aligns with Metro's Service Recovery Plan and restores suspended service hours (80k).
  - The final network proposal is consistent with Metro's 2026-2027 biennial budget.
  - Approximately 28% increase in service hours compared to existing.

## South Link Connections: Baseline Transit Network



# Engagement Timeline – Fall 2026 Implementation



# Engagement Efforts Spring 2024- Summer 2025

3-phase engagement process

- Engagement materials in **14 languages**
- **15** Community Mobility Board members
- **91 institutions, partner agencies, jurisdictions, CBOs and employers** invited to Partner Review Board
- **4 surveys** conducted virtually and in-person (6,700+ responses)
- **7** multi-lingual virtual public meetings
- **250+** organizations outreach list
- **Multilingual media tool kit**
- **Multi-lingual social media campaigns**
- **12** ethnic media publications
- **4** multilingual community liaisons
- Signs at **over 100 bus stops**
- **100+ hours of in-person outreach** at high-ridership bus stops
- **42** Community & Government presentations
- **51,000+** transit E-Alerts

# 8 Formal CBO Partnerships



- 50+ partner led in person & virtual community events
- 5,000+ people engaged

Engagement focused on:

- Black, Indigenous, and people of color (BIPOC)
- Recently arrived immigrants and refugees
- Low-income communities
- People experiencing housing instability
- Queer and Trans Pacific Islanders
- Youth and teens
- Individuals who primarily speak Arabic, Amharic, Burmese, Dari, French, Kurdish, Lingala, Oromo, Pashto, Portuguese, Punjabi, Rohingya, Russian, Samoan, Somali, Spanish, Swahili, Tigrinya, Ukrainian, Vietnamese



# South Link Connections Mobility Priorities



Greater transit coverage



Improved early morning and nighttime service



Faster travel times within and beyond the project area



Improved east-west transit connections



Increased weekend service, especially on Saturdays

# Final Network Highlights

The proposed network enhances all-day, all-week travel with:

- Trips running earlier and/or later and more often on all local and frequent routes.
- New frequent service on two important east-west connections.
- New weekend service where there currently is no service.
- Easier-to-understand service, including:
  - Providing more direct, two-way service to improve travel times.
  - Providing consistent schedules on Saturdays and Sundays for all routes.

Hours from discontinued peak routes are reinvested to meet mobility priorities in the project area.

- 8 suspended peak-only routes, 2 in-service peak-only routes.

Grant funding supports pilot Metro Flex zones in Auburn and Federal Way.

# Final Network Highlights



**Maintains** all existing transit access.

Approximately 22,600 people gain access to transit (**7% increase**).

Approximately 44,600 people gain access to frequent transit (**70% increase**).



Earlier and/or later trips on **8 routes**.



Eleven of fourteen project **routes connect to a Link station**.

Improved connections to the **current and future RapidRide system**.

Added **51% more trips on weekdays** and **72% more trips on weekends**.



New frequent service **every 15 minutes** on two important **east-west corridors**.



**New days of weekend service**.

Routes operate the **same schedule on Saturday and Sunday**.

# Service Improvements

Improvements include:

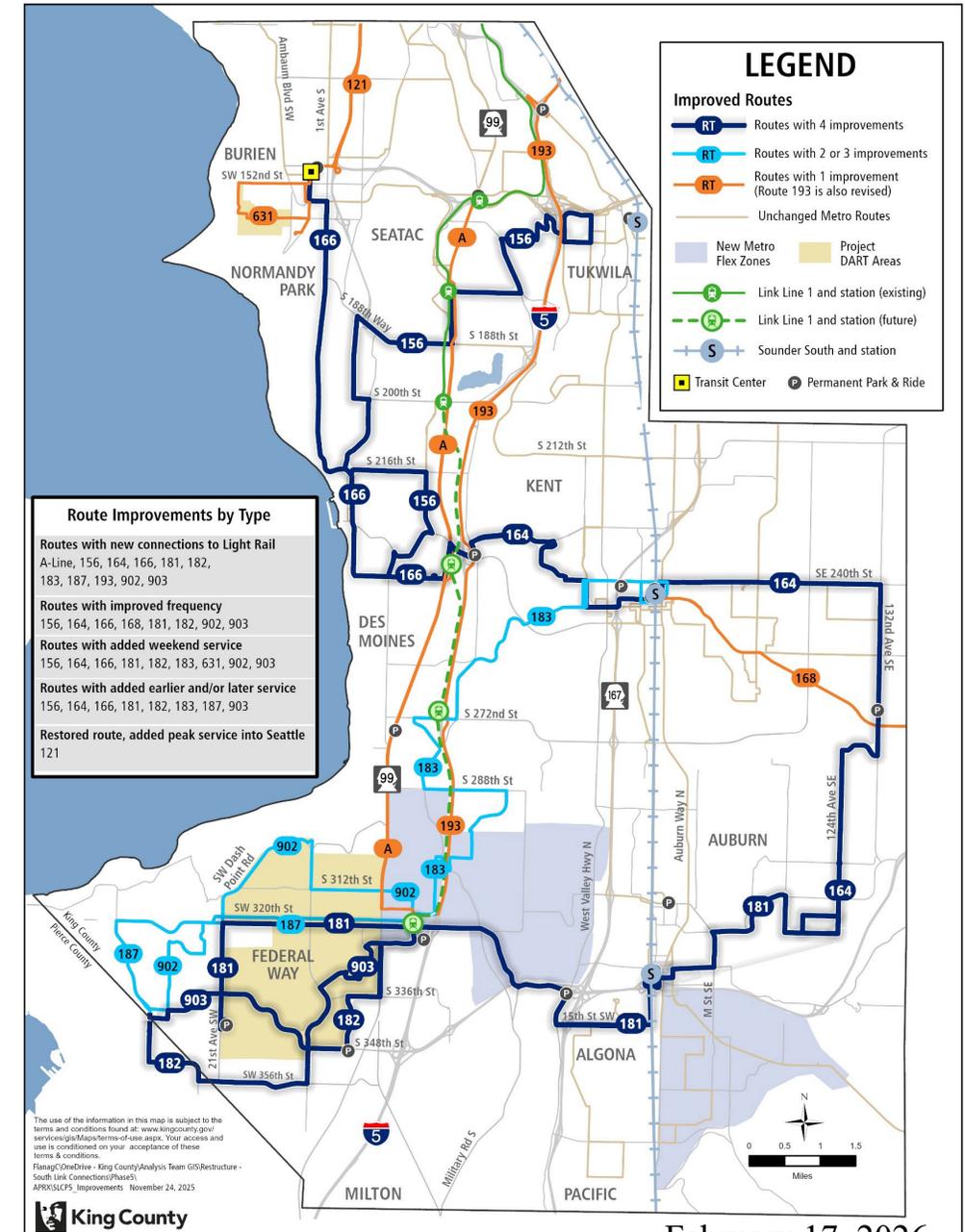
- Connections to light rail
- Improved frequency
- Added weekend service
- Earlier and/or later service
- Restored route

**Dark Blue:** 4+ improvements

**Light Blue:** 2-3 improvements

**Orange:** 1 improvement

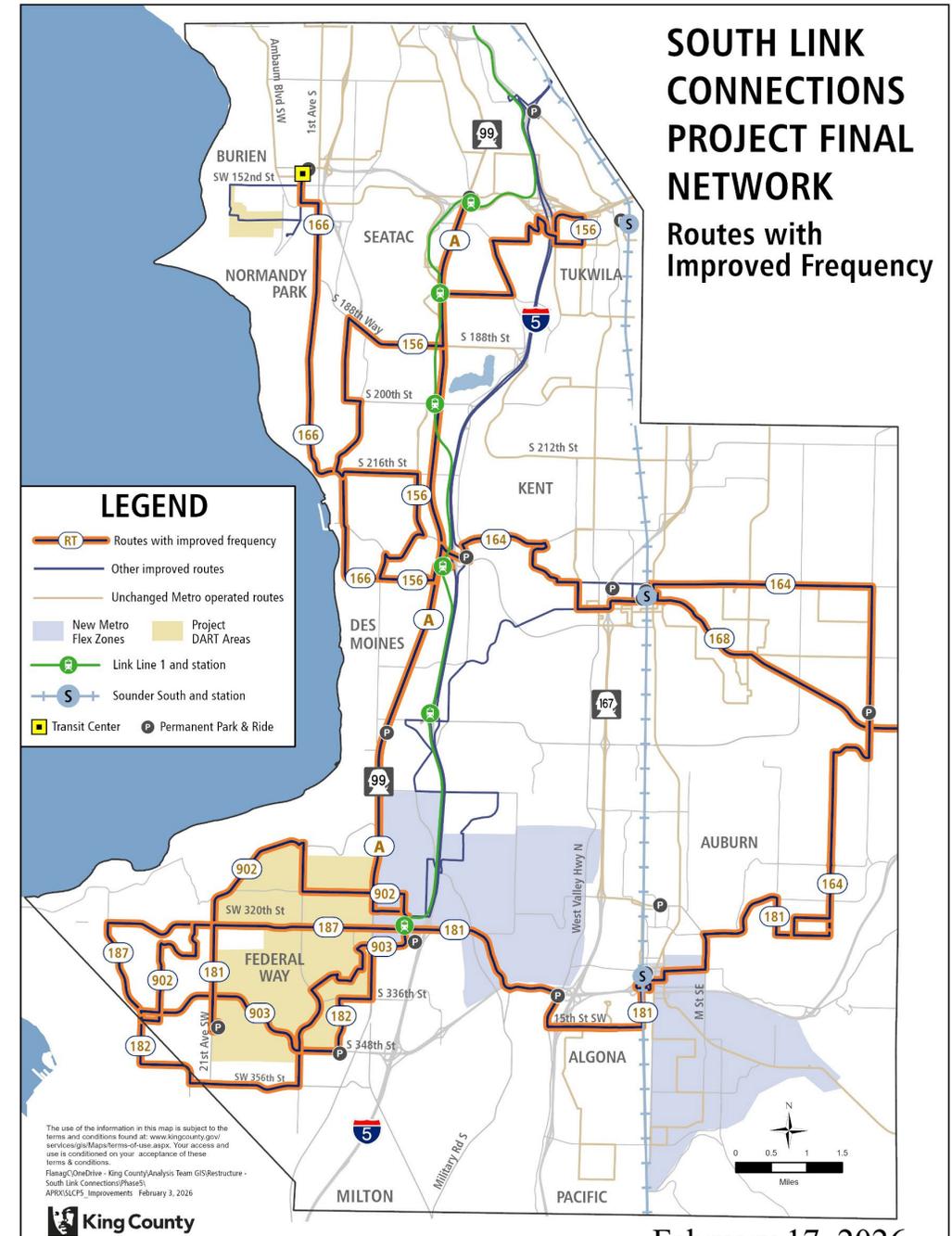
## South Link Connections Final Network: Transit Improvements



# Routes with Improved Frequency

Routes proposed to have trips come more often:

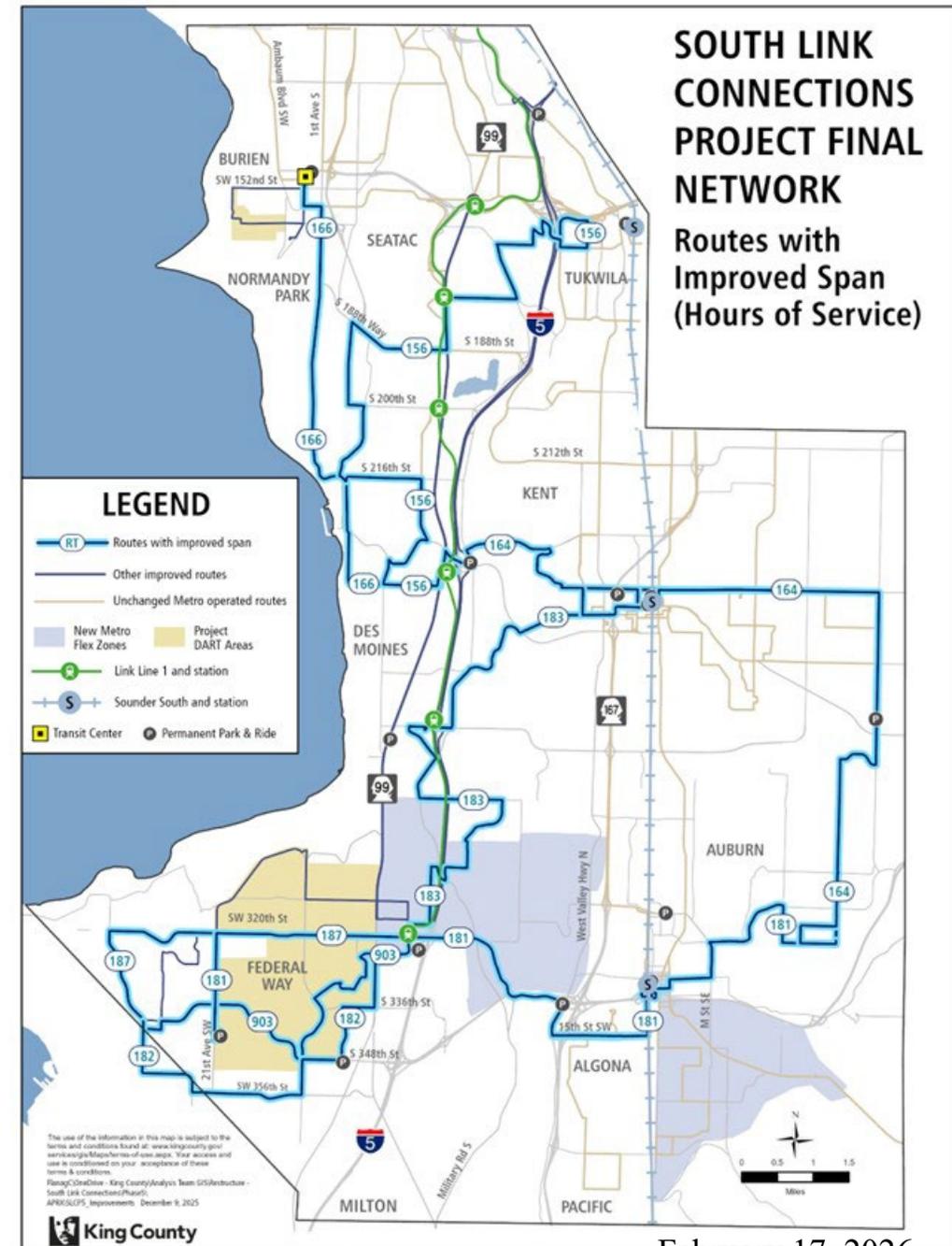
- 156
- 164, 166 (compared to replaced service)
- 168
- 181
- 182
- 187
- 902 (compared to replaced service)
- 903
- A Line



# Routes with Earlier and Later Trips

Routes proposed to have trips start earlier and end later:

- 156
- 164, 166 (compared to replaced service)
- 181
- 182
- 183
- 187
- 903
- A Line



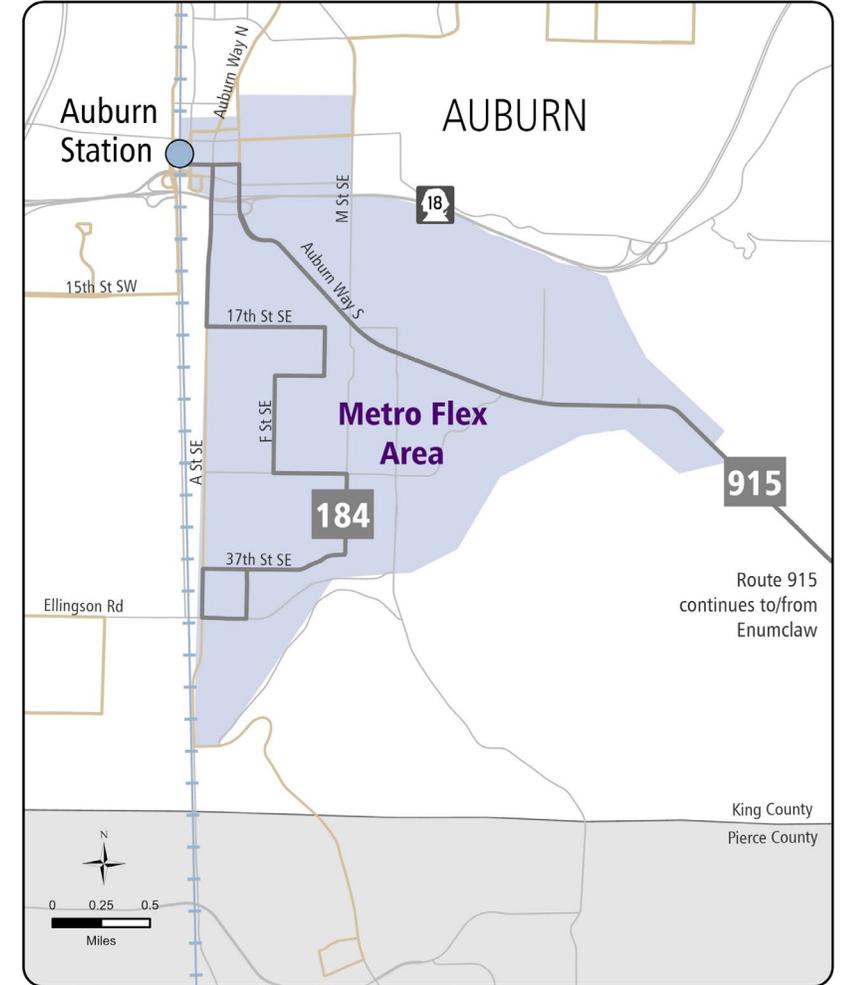
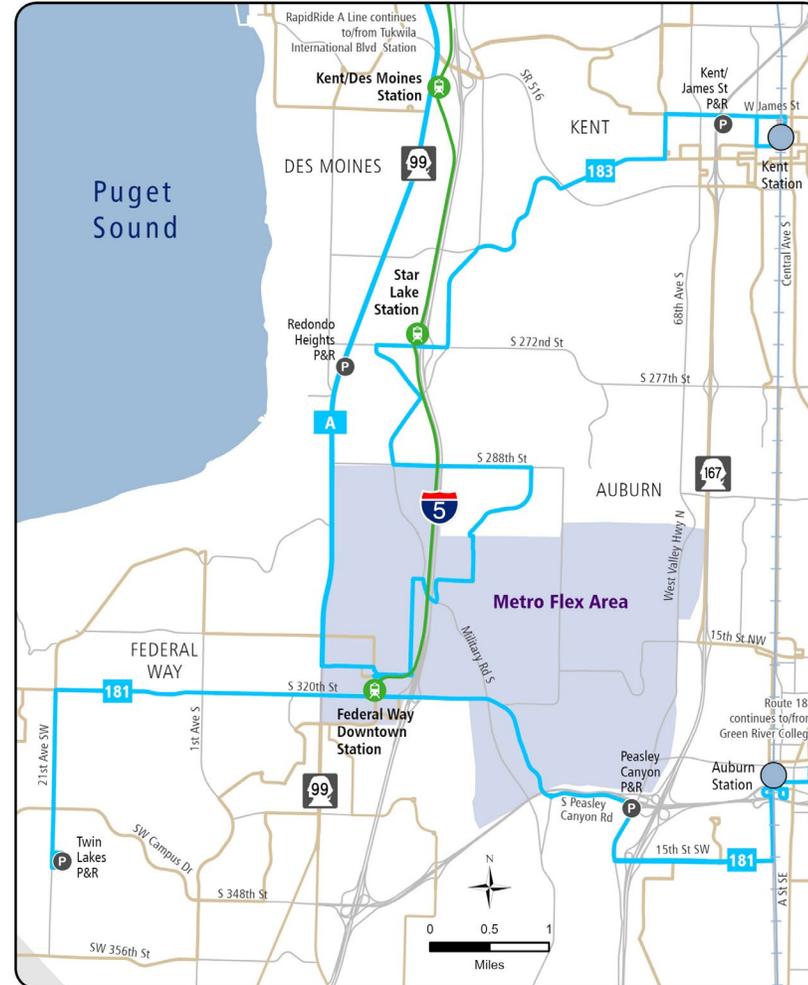
# Routes with Earlier and Later Trips



# Metro Flex Pilot Zones

The final network proposal includes two Metro Flex pilot zones that are grant-funded for two years.

Provides new transit service coverage and connections to Federal Way Downtown Station and Auburn Station.

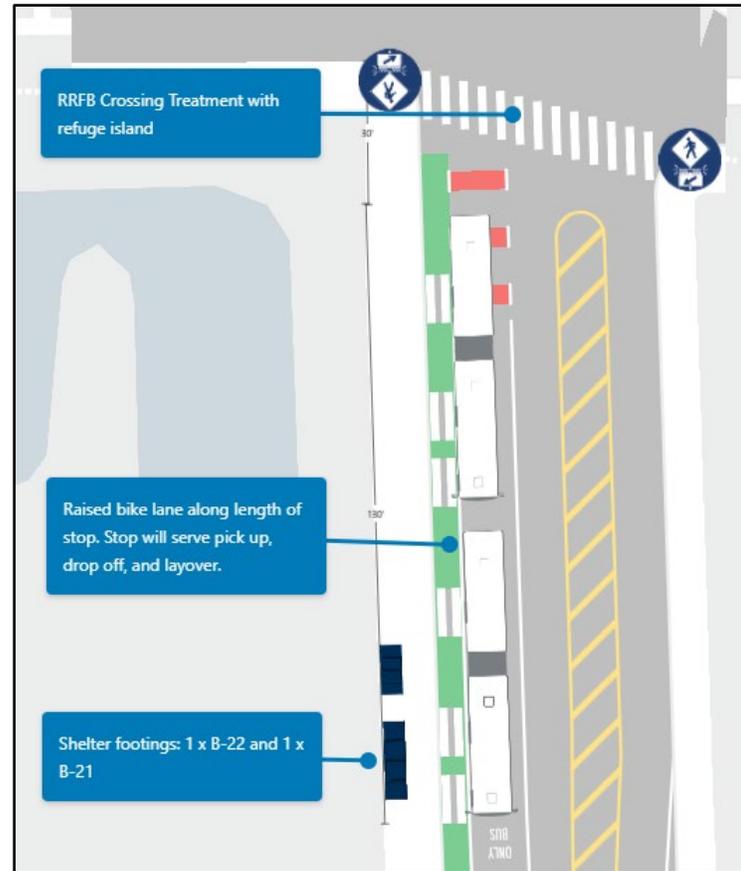


# Network Tradeoffs

- Removal of peak-only services to reinvest resources into the all-day, all-week network in alignment with prioritized mobility needs
  - Suspended routes: 122, 123, 154, 157, 178, 179, 190, 197
  - Currently operating routes: 162, 177
    - Route 162: Mitigation provided by added trips on Route 168
    - Route 177: Mitigation provided by proposed retention of ST Express routes 577, 578
  - Peak-only routes that remain provide competitive travel times or a unique connection
- Requests that were unable to be addressed with this project:
  - Additional transit coverage in southern Des Moines and northern Kent
  - Continued investment in south King County transit

# City Partnerships to Deliver Capital Improvements

- Two new layover bays, 16 new landing pads, and 62 new stops are planned to support the proposed SLC network.
- Successful partnerships with cities of Auburn and Federal Way to deliver improvements.



Pictured: Planned layover improvements at Green River College (left), landing pads planned at stops in West Federal Way (upper right), bus stop and shelter planned in Des Moines (lower right).

# What We Heard

- **73% satisfaction for the network in Phase 3 engagement** (rose 24% percent from the Phase 2 network)
- People **continue to support the investments in more all-day service** (more trips, service that starts earlier and ends later, more weekend service, east-west service on major corridors, etc.)
- **Unanimous approval** from Community Mobility Board
- **14 letters of support** from jurisdictions, community-based organizations and partner agencies

# What We Heard

*“Just want to add that I am really grateful to see frequent local east-west buses that will connect to the new Link stations... The additional hours of service on evenings and weekends will allow more ways to use transit outside of commute trips.”*

*“I really appreciate the effort to add more trips overall, especially on weekends. And making the 187 go in both directions for the entire route would be a complete lifesaver when it comes to getting around efficiently, as it's the main route to and from my neighborhood.”*

*“I live on Military and often have to walk down to the A Line on Sundays when trying to get around, the expansion to [Route 183] Sunday service is something I have wanted for a long time now and I appreciate that my area isn't being forgotten with the expansion to the network.”*

# What We Heard

Feedback from International Rescue Committee engagement:

*"An Afghan immigrant who lives in Federal Way, commutes daily to his job at SeaTac Airport. He welcomed the proposed changes, particularly the new and more frequent east–west connections and the expanded services linking Federal Way Downtown Station to Link light rail and nearby neighborhoods. The increased frequency on Route 182 will make it easier for him and other airport workers to reach the light rail during early mornings and late evenings."*

# What We Heard

Feedback from Iraqi Community Center of Washington engagement:

*"As a Muslim youth rider, I appreciate that the updated bus and train routes create stronger connections between communities like Tukwila, SeaTac, Des Moines, Kent, and Federal Way. These are the neighborhoods where many of us live, study, and attend community programs. The fact that the future Kent/Des Moines station is right next to Highline College is especially valuable for students, and the connections through Kent and Auburn stations make it easier to reach Green River College. Routes like the 164 to Kent East Hill, the 156 and 166 through Tukwila and SeaTac, and the 181/183/187/903 through Federal Way all make a real difference in helping youth access schools, jobs, and daily activities."*

# Next Steps

- **February 23:** Transmittal of ordinance package
- **March 17:** TrEE discussion and possible action
- **March 24:** Council discussion and possible action (if expedited)
  
- **March 2026 service change:** Minor administrative changes to serve new 1 Line stations and expand hours of service on six routes
- **April:** August service change preparation begins
- **August 2026 service change:** Pending ordinance adoption, larger-scale changes, restoration, and service growth would be implemented

Sound Transit is also planning changes to ST Express buses within the project area. Those changes are subject to Sound Transit Board approval.

**Thank you!**  
**Questions?**