



**King County**

**Solid Waste Division**

Department of Natural Resources and Parks

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June 13, 2024

Janée Zakoren

Department of Ecology

Landfill Methane Grant Manager

P.O. Box 47600

Olympia, WA 98504-7600

Dear Janée Zakoren:

The purpose of the letter is to transmit comments from the King County Solid Waste Division on the draft grant guidelines for the new Washington State Landfill Methane Emissions Reduction Grant Program. We appreciate the opportunity to provide input on the grant program design and are excited about the support this program should be able to provide to advance landfill emissions monitoring and reduction projects across Washington State.

King County owns and operates the open Cedar Hills Regional Landfill (CHRLF) and maintains custodial responsibilities for ten closed landfills located throughout King County. King County is reducing its greenhouse gas (GHG) emissions and has ambitious goals, commitments, and actions in its Strategic Climate Action Plan (SCAP). For example, SCAP Strategy GHG 3.20 commits the County to reduce landfill gas (LFG) emissions through improvements in LFG collection and control at the CHRLF; to reduce fugitive emissions not captured by the LFG collection system; and to make LFG improvements at closed landfills.

Recent efforts to capture LFG at CHRLF include the installation of 18 new LFG vertical collection wells in 2024, and planned installation of many additional wells in coming few years. A real-time LFG well monitoring system has also been installed on select wells to allow for adjustments to improve gas collection based on operating conditions. These recent projects are examples of efforts we'd hope to fund and accelerate through this new grant program.

Below are suggestions to maximize the impact and benefits of the new grant program:

- The draft guidelines do not include criteria or scoring based on how much a proposed grant activity would reduce LFG emissions. We respectfully suggest that a key grant scoring criteria be the amount of LFG and/or GHG emissions reduction a project would be estimated to accomplish, not solely compliance with the Landfill


Methane Emissions law. We believe this is aligned with the intent of the legislature's allocation of Climate Commitment Act funding to establish this program.

- The draft grant guidelines penalize (draft grant guidelines section 3) through the proposed scoring approach landfills that have already taken actions to manage LFG emissions – despite the fact that landfills that have taken certain actions will still have additional opportunities to do more to reduce emissions. There should not be a scoring priority for landfills that have no landfill gas collection systems – the scoring priority should be for projects that can maximize LFG collection improvements.
- The final grant guidelines should explicitly allow landfills to propose any activities determined to be eligible (such as those detailed in the “Eligible Costs” section of the draft grant guideline) even if a landfill is already in compliance with new Landfill Methane Emissions law - if the proposed activities achieve additional LFG reduction benefits. Any activity that is demonstrated to achieve significant emissions reductions and/or increase the productive reuse of LFG should be eligible costs.
- The grant program design and draft scoring approach (draft grant guidelines section 2) overly award points to closed landfills. Closed landfills often have lower and declining emissions sources over time compared to currently operating landfills. The draft scoring approach also does not recognize that many large open landfills include large, closed sections and volumes of waste more actively decomposing and generating methane emissions. We suggest that open landfills should score at least as high as closed landfills.
- The grant criteria are punitive to landfill owners and operators that have proactively installed monitoring systems prior to the LFG methane rule. We support that grant funds should be eligible for landfills to install monitoring systems. However, we do not believe that additional grant scoring points should be awarded for landfills without monitoring systems (draft grant guidelines section 5).
- King County supports prioritizing projects that address and reduce environmental health disparities. The County also understands that a primary purpose of the state Landfill Methane Emissions law and this new grant program is to reduce GHG emissions – a type of pollution that is quickly mixed in the atmosphere, and a type of emissions that has similar impacts to climate change no matter how and where it is sourced. The realized local health benefits of any landfill methane emissions project or monitoring project may not be substantial. However, GHG emissions disproportionately affect people through their contribution to climate change, and whichever projects can maximize GHG reductions should be prioritized. We respectfully suggest that the draft scoring point value of up to 50 total points for this criteria is too high.

As draft grant guidelines are currently written, King County does not believe that any of our current efforts to maximize landfill gas collection and productive reuse of LFG would qualify

for grant support. This would be an unfortunate missed opportunity for King County's landfills and others across the state that have significant opportunities to do more to reduce GHG emissions and played our collective role to achieve King County and Washington State's ambitious climate goals.

Sincerely,

DocuSigned by:  
  
Chris Stubbs

Division Deputy Director

Enclosure

cc: Pat D. McLaughlin, Director, Solid Waste Division (SWD)  
Theresa Thurlow, PE, Section Manager, SWD  
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