

## **Tower Landfill Annexation Narrative**

### **I. Overview**

Allied Waste Systems of Colorado, LLC (“Allied Waste”), an affiliate of Republic Services (“Republic”) currently owns and operates the Tower Landfill located at the southeast corner of Tower Road and E. 88<sup>th</sup> Avenue in Commerce City, Colorado (the “Tower Landfill”). Allied Waste is concurrently processing a land use map amendment, right of way vacation, and planned unit development zone document amendment applications for approximately 110 acres of land located adjacent to the Tower Landfill to the east (the “Annexation Property”). This annexation application (“Annexation Application”), if approved, will permit Allied Waste to expand certain current Tower Landfill ancillary operations onto the Annexation Property.

Republic’s Tower Landfill has been operated in a safe and sustainable manner for over forty years and provides a cost effective and safe disposal option to the Denver metropolitan and Front Range areas. Republic operates facilities in forty-six states, employs over 40,000 people, operates 208 active landfills, and provides responsible disposal and recycling services to over 14 million customers. In Commerce City, Allied Waste employs over 330 people at two different locations; the Tower Landfill currently employs thirty-five people and generates over \$1.5 million in revenue per year for Commerce City through the applicable host fees, with a total projected 2024 financial impact of approximately \$2.675 million when including the related franchise/municipal fees, household hazardous round-up sponsorship, and property/sales/use taxes. Allied Waste is the franchise waste and recycling hauler for all Commerce City residents and municipal facilities, which serves over 20,500 residential homes per week.

Approval of all Allied Waste’s pending applications will increase the Tower Landfill capacity by approximately three to five years and could generate over \$10 million in additional host fee and use tax revenue for Commerce City. The annexation and PUD Amendment will also enable Allied Waste to relocate the current Tower Landfill entrance on E. 88<sup>th</sup> Avenue to a new location on the Annexation Property, which will improve traffic flow. Allied Waste will also reconfigure certain elements of the existing Tower Landfill, resulting in less offsite visibility of the operations.

### **II. Current Conditions and Uses and Future Land Uses**

The Annexation Property abuts the Tower Landfill to the west, E. 88<sup>th</sup> Avenue to the North, E-470 to the east and vacant/agricultural land to the south. The Annexation Property is currently located in the Adams County A-3 Zone District and occupied by agricultural uses and one residential structure with multiple out-buildings. The Annexation Property does not contain any existing streets and only one driveway to the existing residential structure and outbuildings. There are existing overhead electrical utilities on the Annexation Property and a water pipeline easement and multi-use easement located on the eastern boundary of the Annexation Property.

Upon annexation, Allied Waste will: (1) remove the existing buildings on the Annexation Property and some of the overhead electrical utilities; (2) relocate the Tower Landfill entrance to the Annexation Property; (3) relocate the existing modular office and establish a modular shop on the Annexation Property; (4) relocate scales and scale houses to the Annexation Property; (5) provide additional storage and staging areas for the Tower Landfill on the Annexation Property; (6) utilize a portion of the Annexation Property for soil stockpiles; (7) establish an inert liquid evaporation pond on the Annexation Property; and (8) establish a customer drop off area for household waste, appliances and organics on the Annexation Property;

### **III. Comprehensive Plan**

The Tower Landfill property has a future land use designation of Utility, which specifically contemplates active and future landfill uses. The Annexation Property is located within Commerce City's IGA Growth Boundary and the Annexation Application is consistent with the City of Commerce City C3 Vision Comprehensive Plan (the "Comprehensive Plan"). Specifically, the Annexation Property currently has a future land use designation of DIA Technology, which provides that no residential uses are allowed and contemplates employment and certain industrial uses as appropriate land uses. Contemporaneously with this Annexation Application, Allied Waste has submitted a Land Use Plan Amendment to change the Annexation Property's future land use designation from DIA Technology to Utility.

The Annexation Property will enhance and extend the employment opportunities available at Tower Landfill. Secondly, the Annexation Property will provide for solid waste disposal infrastructure to allow for continued economic growth of Commerce City. Additionally, the Annexation Application meets the Comprehensive Plan's Public Facilities and Infrastructure Policy 1.11 which is to "promote the provision of adequate buffers for the Tower [ ] Landfill to prevent the encroachment of incompatible land uses" because the relocation of the existing E. 88<sup>th</sup> Avenue entrance onto the Annexation Property will enable Allied Waste to re-contour the northern slope of the Tower Landfill, which will likely result in operations that are less visible to future residential and commercial development to the north and west of the site, but will not increase the maximum currently permitted height of the landfill. Lastly, amending the Allied Waste PUD to the east onto the Annexation Property will result in the Tower Landfill being a standalone use between Tower Road and E-470; thus, preventing other potentially incompatible land uses on the Annexation Property, which is adjacent to the existing Tower Landfill. E-470 will act as a natural buffer to all other future uses to the east.

### **IV. Existing Significant Natural Features**

The Annexation Property is currently being utilized as agricultural land. There are no known significant natural features such as large trees, specialized vegetation, floodways, or wildlife habitat within the site. Allied Waste submitted an Environmental Assessment as part of the Engineering Design and Operations Plan Revision 1 documenting environmental findings surrounding the Annexation Property and Tower Landfill property.

## **V. Services and Schools**

Commerce City has sufficient services to serve the limited uses contemplated on the Annexation Property and the proposed uses will not generate any school students.

## **VI. Oil and Gas**

There are no active oil and gas leases or operations on the Annexation Property.

## **VII. Special Districts**

The Annexation Property is in the following tax districts: (1) Rangeview Library District; (2) RTD; (3) School District 27J; (4) South Adams County Fire Protection District; (5) Urban Drainage and Flood Control; and (6) Urban Drainage South Platte.