CITY OF
ISSAQUAH
WASHINGTON

Mayor's Office
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December 12, 2025

Dear Director Sixkiller,

I am writing to express my concerns regarding Ecology's draft rules that were released to implement the Organics Management Laws.

Our city fully supports the vision of reducing waste, strengthening composting infrastructure, and building a truly sustainable circular economy for organic materials. However, as drafted, I am concerned that the draft rules could unintentionally move the state away from these goals by making it more difficult for local composters to operate while creating unnecessary costs for local governments and our ratepayers.

Specifically, I am concerned that the draft rules:

- Impose new and costly inbound contamination and product standards on composting facilities that fail to consider investments in post-processing technology and ultimately make it more challenging for composters to operate. At a time when we know we should be removing barriers to help composters grow and divert more organic materials from landfills, several of Ecology's proposed rules impose new layers of restriction and cost that will have the opposite effect.
- Fail to consider the potential cost increases local governments and our ratepayers may face from these standards. The draft rules identify generators and haulers as responsible for contaminated loads that would not meet the new 2% standard for inbound contamination. We are concerned the cost of compliance with this new standard will be passed along to our ratepayers who are already facing utility rate increases in a variety of spaces.
- Risk increasing landfill disposal of materials our contracts identify as recyclable or compostable, undermining the diversion goals associated with these new laws.
- Lack of a source separation requirement for pre-processors will result in more commingled, mixed-waste loads containing large volumes of garbage that could have a negative impact on solid waste tax revenue for our jurisdictions.
- Do not propose any comparable inbound contamination limits, recovery standards, or meaningful requirements to ensure maximum recovery of resources for pre-processors, creating a regulatory imbalance that may undermine our region's longstanding source separation framework.

I respectfully urge the Department to reconsider the draft rules to ensure they provide balanced, evidence-based standards to all organics processing pathways. I also ask you to reconsider the 2% contamination limit given the impact it could have on our ratepayers.

Thank you for your consideration of these concerns and for your continued collaboration with local governments across our state.

Sincerely,

Mary Lou Pauly, Mayor of Issaquah