City of Vancouver (Matt Bucy)

Please see the attached file for the City of Vancouver's comments.

Thank you,

Matt Bucy
Matt.Bucy@cityofvancouver.us

December 10, 2025

Mr. Chris Fredley
Solid Waste Management Program Rule Coordinator
Washington Department of Ecology

Dear Mr. Fredley:

Thank you for the opportunity to comment on the Washington Department of Ecology's (hereafter, Ecology) proposed updates to Chapter 173-350 Washington Administrative Code (WAC). The City of Vancouver offers the following comments:

1. Regarding the addition of "organic materials" to the definition of "recyclable materials"

The proposed addition of "organic materials" to the definition of "recyclable materials" in WAC 173-350-100 could have contract and service implications for local jurisdictions. In the City of Vancouver, "recyclable materials" may be collected by our contracted service provider, Waste Connections, or by a licensed collector of recyclable materials per Vancouver Municipal Code (VMC) Chapter 5.62. "Organics," "food scraps," and "yard debris" are each specifically defined in VMC Chapter 6.12, and are all distinct from the term "recyclable materials." Similarly, "organic material" and "recyclable material" are distinct terms with separate definitions in the Clark County Comprehensive Solid Waste Management Plan. Therefore, while the City of Vancouver does license collectors of recyclable materials, it does not currently license collectors of organic materials for organic materials management other than our contracted service provider.

If "organic materials" were incorporated into the definition of "recyclable materials" in WAC 173-350-100, it could potentially impact hauling regulations for organic materials and organic materials management in the City of Vancouver. This would affect the City's implementation of the Organics Management Laws, including the Organics Recycling Collection Areas and Business Organics Management Areas. At the least, it could result in the language of our contract and municipal code being potentially in conflict with Washington Administrative Code.

The City of Vancouver would appreciate it if Ecology could explain the reasons why "organic materials" ought to be incorporated into the definition of "recyclable materials." What are the benefits of this proposed revision? The City of Vancouver prefers keeping the definition of "organic materials" separate from the definition of "recyclable materials." This way, these

two different material streams can be regulated separately or grouped together when appropriate.

2. Regarding "preconsumer vegetative food waste"

Ecology has proposed adding "food waste" as a newly defined term in WAC 173-350-100 and deleting the definitions for "post-consumer food waste" and "preconsumer food waste." Per the discussion in Ecology's November 5, 2025, meeting, it is the City of Vancouver's understanding that the "food waste" definition comes from statute, and that the definitions for "post-consumer food waste" and "preconsumer food waste" are proposed for deletion because the differentiation between pre-consumer/post-consumer is no longer important. However, Ecology has also proposed revising the term "preconsumer vegetative waste" to "preconsumer vegetative food waste." Please explain why maintaining the "preconsumer" distinction is necessary for this definition, but not for "food waste."

3. Regarding "clean wood waste" vs. "wood waste"

Ecology has proposed adding "clean wood waste," "land clearing debris," and "low-grade wood" as newly defined terms in WAC 173-350-100 and has proposed deleting the definitions for "wood derived fuel" and "wood waste" from this subchapter. Per the discussion in Ecology's November 5, 2025, meeting, it is the City of Vancouver's understanding that the proposed new term "clean wood waste" would effectively replace the term "wood waste."

However, the term "wood waste" (not "clean wood waste") still appears in several sections of the proposed revised WAC 173-350. For example, in the proposed rules, the definition for bulking agent still uses the term "wood waste," not "clean wood waste." The proposed definition for the new term "land clearing debris" includes the term "wood waste" but not "clean wood waste." "Wood waste" is also mentioned in the current definitions for "limited purpose landfill" and "manufactured organics," and neither definition has been proposed for revision. To avoid potential enforcement challenges resulting from inconsistent definitions, please ensure consistency in the usage of the terms "wood waste" and "clean wood waste" throughout WAC 173-350.

If you have any questions about these comments, please contact me or Matt Bucy at Matt.Bucy@cityofvancouver.us or 360-487-7166.

Sincerely,

Will Elder
Environmental Services Manager

Cc: Liz Erickson, Amanda Romero, City of Vancouver
Tatum Flowers, Clark County