

## Michael Mactutis (Michael Mactutis)

Please find attached the City of Kent comments on the draft rule language for Organics Materials Management.

Sincerely,

Michael Mactutis

Environmental Engineering Manager

City of Kent



**PUBLIC WORKS DEPARTMENT**

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December 12, 2025

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

Dear Mr. Fredley,

Thank you for the opportunity to provide informal comments on the proposed rulemaking of Chapter 173-350 WAC – Organics Management. I am writing to express the City of Kent's concerns regarding Ecology's draft rules that were released to implement the Organics Management Laws.

The City fully supports the vision of reducing waste, strengthening composting infrastructure, and building a truly sustainable circular economy for organic materials. However, as drafted, the City is concerned that the draft rules could unintentionally move the state away from these goals by making it more difficult and costly for local governments and our ratepayers. The draft rules could also result in an increased amount of compostable materials being disposed of as solid waste.

Specifically, we are concerned that the draft rules:

- Impose new and costly inbound contamination standards on the public and composting facilities that fail to take into account investments that have already been made in post-processing technology. We respectfully request you to reconsider the 2% by volume incoming contamination limit.
- 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. The City is 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 places.
- Risk increasing landfill disposal of compostable materials, undermining the diversion goals associated with these new laws. Enforcement of the 2% maximum contamination at the tipping point could result in large amounts of compostable material being rejected from a composting site that has the equipment to be able to filter the contaminants out.

The City supports the goals of the Organics Management laws, but believes the draft rules may inadvertently undermine those goals. Thank you for your consideration of

these concerns and for your continued collaboration with local governments across our state.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Mactutis", written in a cursive style.

Michael Mactutis, PE, CFM  
Environmental Engineering Manager