



August 7, 2026

Dear Mr. Fredley,

Thank you for the opportunity to provide comments on the Department's latest proposed organics management rules. The City of Everett supports policies that reduce waste, strengthen recycling and composting systems, and advance Washington's environmental goals.

We are concerned that several aspects of the proposed rule could unintentionally weaken two systems that are currently functioning well: recycling and composting.

Today, businesses in Everett separate food waste from packaging before collection. This straightforward process helps keep recyclable materials clean and ensures that organic material remains suitable for composting. The proposed rule would allow mixed packaged and unpackaged food waste to be directed to depackaging facilities with few operational standards. As a result, recyclable packaging could ultimately be landfilled, while plastic and other contaminants introduced into the organic stream could reduce compost quality.

We believe there is a practical solution. Clean, source-separated food waste should continue to be managed through composting systems, while only materials that are genuinely difficult to separate should be directed to depackaging facilities. Other states, including Vermont, have adopted this approach. We encourage Ecology to clearly define what constitutes "hard-to-separate" packaging so that generators, haulers, processors, and regulators have a consistent understanding of which materials belong in depackaging systems and which should remain in the clean compost stream.

We are also concerned that the proposed rule does not establish meaningful performance standards for depackaging facilities. There are no minimum recovery requirements, no limits on contamination or landfill disposal, and no reporting requirements to demonstrate how much material is recovered, composted, recycled, or disposed of. Without these basic accountability measures, it will be difficult to determine whether depackaging facilities are reducing landfill waste or simply shifting it elsewhere in the system. We respectfully encourage Ecology to establish clear performance standards and reporting requirements before the rule is finalized.

The proposal also raises concerns regarding source separation. Many businesses in Washington are required under state law to separate organic waste from other waste streams. In our view, a container holding both packaged and unpackaged food does not constitute source-separated organic material. We do not believe the rule should treat it as such or redefine that longstanding requirement through this rulemaking.

Office of the Mayor
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Finally, we encourage Ecology to retain the current finished compost standards. The existing standards have supported a strong compost market while protecting product quality and public confidence. More restrictive standards could increase costs without a demonstrated environmental benefit. Maintaining a healthy and sustainable circular economy depends on protecting both the quality of compost and the systems that produce it.

Thank you for considering the City of Everett's comments. We appreciate the opportunity to participate in this rulemaking and look forward to continuing to work with Ecology to develop practical, effective organics management policies.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Cassie Franklin', with a long horizontal flourish extending to the right.

Cassie Franklin, Mayor
City of Everett

**Office of the Mayor
CASSIE FRANKLIN**



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