



Washington State Building & Construction Trades Council

Todd Mitchell, President

Heather Kurtenbach, Executive Secretary

August 7, 2026

Chris Fredley

Department of Ecology
Solid Waste Management
P.O. Box 47600
Olympia, WA 98504-7600

Dear Mr. Fredley:

On behalf of the Washington State Building and Construction Trades Council, I appreciate the opportunity to provide comments regarding organics management in Washington State.

The men and women represented by our affiliated local unions have long benefited from Washington's commitment to strong environmental stewardship and sound public policy. For generations, our members have built and maintained the infrastructure, facilities, and industrial projects that support cleaner air, safer water, responsible waste management, and a stronger economy. Thoughtful environmental standards create opportunities for workers to earn family-supporting wages while helping advance our state's environmental goals.

Because of that commitment, we feel compelled to comment on the current rulemaking process. The Washington State Building and Construction Trades Council has consistently supported clear, consistent, and predictable regulatory standards that provide certainty for businesses and workers alike. Weakening standards for a specific segment of the industry would be inconsistent with the expectations placed on countless other businesses that have invested substantial resources to comply with Washington's environmental requirements, including the provisions of RCW 70A.205.540.

Washington has established itself as a national leader in promoting accountability and innovation in environmental practices, and the organics management industry should be held to those same standards. Allowing a small number of stakeholders to influence contamination thresholds or shift responsibility for waste processing onto food producers undermines the principles of fairness, accountability, and innovation. It also sends the message that sustained lobbying efforts can be used to circumvent established environmental objectives.

Should the current proposal result in weakened standards, it risks encouraging similar efforts in other sectors seeking regulatory relief rather than investing in innovation and compliance. Such an outcome could undermine environmental progress while creating uncertainty for the businesses and workers who have invested in cleaner technologies and responsible waste diversion solutions.

Our state's environment and the thousands of skilled construction workers we represent depend on policies that encourage innovation, reward responsible investment, and maintain confidence in Washington's regulatory framework. We respectfully urge the Department of Ecology to continue supporting contamination standards and diversion solutions that move the industry forward rather than reversing the progress that has already been achieved.

Thank you for the opportunity to submit these comments and for your consideration of our perspective.

Sincerely,



Heather Kurtenbach, Executive Secretary
Washington State Building & Construction Trades Council

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