



Longview/Kelso Building Trades Council

Mike Bridges, President

Adam Davis, Recording Secretary

Chris Fredley

Department of Ecology
Solid Waste Management
PO BOX 47600
Olympia, WA 98504-7600

Dear Mr. Fredley

The Longview/Kelso Building and Construction Trades Council (LKBCTC) appreciates the opportunity to comment on organics management in Washington State. The working people we represent have benefited for decades from Washington's evolving standards for air, soil, water, and waste management. Making industrial processes cleaner and safer provides Building Trades workers with the opportunity to earn wages and benefits that can sustain a family while also contributing to the betterment of our environment.

For this reason, the LKBCTC felt the need to weigh in on the current rulemaking process. We have advocated for the Department of Ecology to maintain clear, consistent, and predictable standards over the years. Decreasing the standards for this particular industry is contradictory to what many other projects looking to build and operate in this state have faced, and punishes the businesses that have invested responsibly into meeting the expectations of RCW 70A.205.540.

Washington is a leader in holding businesses accountable for doing better for the environment and the organic materials industry should be no exception. Allowing a few companies to dictate contamination limits or place the responsibility of waste processing on food companies suggests that with the right lobbying efforts, any organization can push the Department of Ecology to ignore their responsibility to the climate. If the current rulemaking efforts to loosen standards are successful, other businesses will inevitably increase their deregulation efforts in the hopes of having a similar outcome. This threatens the health of our state and could lead to stagnation in the innovations that keep those that we represent employed.

Our environment and the thousands of Building Trades workers in Washington are counting on the Department of Ecology to not buckle to the pressure coming from a few select companies. The LKBCTC therefore respectfully asks that this rulemaking process reflect the efforts to create diversion solutions and contamination standards that support improvements to the industry, not walk back the progress already made.

Thank you for the opportunity to submit this comment on behalf of the LKBCTC.

Sincerely,

Mike Bridges
President LKBCTC
C-360-431-1472