

Snohomish County Solid Waste (Jon Greninger)

Thank you for the opportunity to comment on the draft statewide materials lists for the Recycling Reform Act. Snohomish County Solid Waste supports improved recycling outcomes statewide and would like to highlight several operational considerations that are essential for successful implementation of the proposed requirements.

First, Snohomish County Solid Waste continues to face facility processing capacity and physical space constraints at our transfer stations and drop boxes. Our recycling areas already operate within tight footprints and, if these sites are required to collect all materials on the residential recycling list, we would not be able to add new collection bins without compromising the ease of use, traffic flow, and level of service that customers currently experience.

Additional clarity on collection methods, specifically whether listed materials must be collected commingled or source-separated. Maintaining local flexibility is essential for our operations.

Certain materials, such as glass, are better collected separately to prevent breakage and maintain staff safety, whereas plastics can be difficult for residents to distinguish by resin type and are better suited for commingled collection. We also prefer to continue collecting aluminum, steel, and tin cans in dedicated bins to ensure this high value commodity stream remains uncontaminated.

Providing local flexibility for collection methods will help alleviate space limitations and reduce the strain on staff resources.

It would further be helpful to understand how the Recycling Reform Act will align with other major statewide initiatives, both proposed and currently underway, including the Recycling Refund Program study and the Organics Management Law. Introducing multiple large systems at the same time risks creating conflicting requirements, duplicative material categories, and operational strain. Alignment among these programs is critical to ensure new mandates do not unintentionally undermine the recycling systems built under the Recycling Reform Act or divert resources needed for successful implementation.

We also noted inconsistencies between the draft statewide lists and Ecology's Designated Recycling List contained in the workbook. For example, the workbook recommends against curbside recycling of aseptic and gable top cartons, paper and plastic cups, glass, and polycoated fiber food packaging, yet these items appear on the preliminary statewide list. These differences should be resolved to give jurisdictions clear, consistent direction and to ensure that collection requirements align with current recycling markets and the practical recyclability of these materials.

Finally, we request continued flexibility in determining which materials are appropriate for collection at county-operated solid waste facilities. Because residential curbside recycling service is widely available throughout Snohomish County, it is neither necessary nor operationally practical for our transfer stations and drop boxes to mirror the full residential curbside list. Allowing solid waste facilities to select which recyclable commodities they can safely and effectively manage will help ensure that collection practices remain aligned with site-specific space limitations, equipment capabilities, and operational demands. Maintaining this flexibility will enable us to continue providing efficient, safe, and accessible services while supporting overall countywide recycling performance.

Snohomish County Solid Waste looks forward to ongoing collaboration and remains ready to contribute operational data, practical experience, and local insights to support the development of workable, effective statewide recycling solutions.