

Association of Washington Cities (Shannon McClelland)

Thank you for what appears to be a thorough review of materials for inclusion on the statewide recycling list. We wanted to address two issues - the first criteria of Statewide Collection Access and the limited list of materials on the alternative collection list.

1. Statewide Collection Access Criteria

Although the agency has discretion under RCW 70A.208.090 to add different criteria or factors and to disregard the statutory list entirely, I think it's instructive to note that whether a material is broadly collected under the current system was not chosen by the Legislature in the enumerated list of 12 criteria or factors. This was not an oversight. The current system creates inequity because it relies on whether the local rate base - and the local service provider - can sustain a list of materials beyond the traditional - mixed paper, cardboard, metal cans, plastic bottle and jugs, and for some, glass bottles and jars. This list has nothing to do with what types of packaging are put on the market, compatibility with the collection or processing system, or the environmental impact of the packaging.

In passing the Recycling Reform Act, the Legislature acknowledged the limits to the current system and added a force multiplier - producers. We are asking the agency to see beyond what has been collected in the past, and to give little, if any, weight to whether an item is collected now or how broadly. That is the role of the Needs Assessment. Given that the RRA is going to expand services dramatically across the state, using a metric that includes only which jurisdictions have curbside service now inherently minimizes the potential recovery of a material - indicating something is "challenging" simply because of the limitations of the current system.

2. Alternative Collection List

We were surprised at how limited this list was. Did the agency consider widely collected material through existing take back programs or only government-funded programs? For example, black plastic plant pots. These are accepted by, at least, Home Depot and Lowe's statewide, by our understanding, and likely locally owned nurseries, as well. What about porch pick-up services, like Ridwell? Were those program materials considered and under what category? Are those considered curbside or alternative collection?

Finally, it would very helpful to add a description for each material that a lay person would recognize. For example, clamshells for berries.

Thank you for your consideration of our comments.