Seattle Public Utilities

October 30, 2026

Re: Recycling Reform Act Preliminary Needs Assessment Draft

Department of Ecology,

Thank you for the opportunity to submit comments on the draft Preliminary Needs Assessment for the Recycling Reform Act (Chapter 70A.208 RCW). As a member of the RRA Advisory Council, I raised a number of concerns and suggested adjustments to the draft Preliminary Needs Assessment during the Advisory Council meeting on October 8 that I hope are already being considered and addressed. Since that meeting, three additional issues have come to my attention. This letter highlights these additional concerns.

1) **Overestimation of tons collected from residential generators for recycling.** Seattle Public Utilities has been made aware by The Recycling Partnership that the amount of materials estimated to be collected for recycling from residential generators is likely overestimated, in comparison to normalized data from residential recycling programs across the country.

   We have validated this inconsistency with our own program data, which we submitted as part of our Service Provider Registration: Seattle's Residential Recycling Program collected approximately **537 pounds per single-family customer** in 2025 (47,425 tons collected from 176,656 single-family households served). Our recently published 2025 Residential Garbage and Recycling Study (see Figure 1) found that 83 percent of residential recyclable materials generated by single-family customers were captured in the Recycling stream. This suggests that the total amount of residential recyclable materials *generated* by single-family customers in Seattle was 647 pounds in 2025.

   For multifamily customers, Seattle's program collected approximately 258 pounds per household (27,304 tons collected from 211,813 households served) in 2025, and captured approximately 65 percent of recyclable materials generated, indicating that multifamily customers generated approximately 397 pounds per household in 2025.

   Given that Seattle's Residential Recycling program is among the most comprehensive and successful in the state, and that there are many Washington households that, whether by choice or lack of availability, do not currently participate in residential recycling programs, we would expect the average pounds collected per household statewide under current service levels to be lower than Seattle's 2025 program outcomes. However, the estimated tons presented in the draft Preliminary Needs Assessment appear to significantly exceed Seattle's levels.

   We strongly encourage Ecology and the consulting team to take a closer look at the quantities presented in Section 5 of the Preliminary Needs Assessment and consider adjusting them downward to more accurately reflect recycling levels under current service availability and participation levels in Washington.

2) **Seattle-area Material Recovery Facility not accounted for in Section 7**. Key Works is a Material Recovery Facility located within Seattle city limits. Although Key Works primarily receives recyclable materials from nonresidential generators, we believe that Key Works does also process some material from residential recycling programs in Washington and, as a result, should be included and evaluated as part of the RRA Needs Assessment process.

3) **Lack of Public Place Collection inventory beyond local governments**. The draft Preliminary Needs Assessment indicates that the public place analysis is based on local-government survey responses from 71 jurisdictions. While it is helpful to gather information from local governments on public place recycling collection, there is a much larger set of government entities, including state and regional agencies and special purpose districts, that provide this service and that will be eligible for reimbursement under the RRA.

   Examples of public places where recycling is collected include: state and regional parks, campgrounds, recreation facilities, and marinas; transit stations and terminals, including train, bus, and light rail stations, ferry terminals, and airports; publicly accessible areas of public college and university campuses; publicly accessible areas of public facilities such as libraries, community centers, and government buildings; and indoor and outdoor event centers managed by government entities such as Seattle Center and the Seattle Convention Center.

   I understand that additional data collection is likely not feasible for the Preliminary Needs Assessment, but I believe that these services and the entities that provide them should be more comprehensively inventoried and documented as part of the full RRA Needs Assessment.

Thank you for your consideration and attention to further addressing these concerns.

Sincerely,



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