Lautenbach Recycling (Troy Lautenbach)

LAUTENBACH RECYCLING

Public Comments Submitted to the Washington State Department of Ecology
Regarding: Recycling Reform Act—Draft Preliminary Needs Assessment

To the Department of Ecology:

Thank you for the opportunity to comment on the Draft Washington Preliminary Needs Assessment. We appreciate the effort required to compile this information and offer the following comments with the understanding that additional work and refinement will occur during the second needs assessment.

The document provides a useful overview, but information gaps across all five assessment topics limit the conclusions that can be drawn. In particular, designed or permitted capacity should not be treated as a measure of additional capacity for specific materials. The ability to handle more material depends on equipment, staffing, contamination levels, available feedstock, and reliable end markets—not simply the difference between permitted capacity and current throughput. We respectfully request that Ecology assess material-specific sorting and processing capacity across Washington under actual operating conditions, rather than relying on design capacity or facility counts. This assessment should consider regional material volumes alongside the capital costs of adding or upgrading sorting infrastructure to determine where expanded capacity is needed and whether those volumes can support cost-effective investment.

The majority of composting facilities across the U.S. do not accept compostable plastics. Ongoing confusion about acceptable materials increases labor, equipment, and infrastructure costs. These costs, combined with effects on compost quality and marketability, should be evaluated before assuming expanded acceptance is feasible.

The full needs assessment should evaluate the entire recycling process: collection, transportation, acceptance by a receiving facility, successful processing, and reliable end markets for the materials. We request that Ecology verify actual receiving facilities and final destinations rather than relying on potential outlets before making policy decisions.

Thank you for considering these comments.

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