Green Okanogan (Carol Lanigan)

1. Formally Recognize Decentralized Processing Nodes / "Mini-MRFs" (Section 7.0 & Table 24):
The draft PNA counts only the "Big 7" automated single-stream facilities as Material Recovery Facilities (MRFs), reporting zero MRFs in the Central region (Figure 13, Table 24). Consequently, comprehensive recycling facilities like Methow Recycles and Green Okanogan are categorized merely as "drop-off collection sites" (Table 22). Under RCW 70A.208.020, an MRF is legally defined as "any facility that receives, compacts, repackages, or sorts source-separated solid waste for the purpose of recycling". Depots that manually sort, densify, bale, and direct-market commodities function as decentralized processing nodes. Ecology must recognize this processing capacity so rural depots are not underfunded when PRO reimbursement structures are developed.

2. Accurately Represent Rural Access Beyond "Curbside Garbage Matching" (Section 6.0 & Figure 8):
The gap analysis and service maps (Figures 8, 10, and 11) label Central and Eastern Washington as large unserved gaps based on the single-family curbside matching metric (where 28% of Central households have curbside garbage without curbside recycling). This framing conflates a lack of commingled curbside carts with an absence of recycling. In low-density, mountainous valleys, source-separated drop-off depots are often far more viable and deliver contamination rates below 2%—vastly cleaner than urban single-stream bins. The Needs Assessment must visually distinguish between truly unserved areas and those served by drop-off hubs, while incorporating seasonal tourist volumes into rural generation models.

3. Incorporate Regional Fiber End Markets — Add Keyes Packaging Group (Section 8.0 & Table 30):
Section 8.0 states that Washington has limited in-state capacity for lower-grade fiber and relies heavily on international export. In doing so, Table 30 ("In-state end markets for recovered paper") completely omits Keyes Packaging Group (Keyes Fibre) in Wenatchee. Keyes operates the largest molded-fiber manufacturing plant on the West Coast, actively consuming regional post-consumer paper and cardboard to produce fruit pack trays and egg cartons. Keyes must be formally added to Table 30 as a vital in-state manufacturing market. This regional recycling solution is utilized by Methow Recycles, Green Okanogan, Sunrise and Zippy Disposal. This is an excellent example of a regional circular economy and should be acknowledged and well-funded under PRO reimbursement structures.

4. Prioritize Existing, Willing Local Service Providers for Phase 2 Buildout (Sections 7.3 & 10.4):
Section 7.3 notes that 33% of drop-off sites could expand capacity with additional containers, staffing, and equipment. As Phase 2 evaluates system investments in 2027, the state and the PRO must prioritize upgrading existing local operators (investing in balers, storage, and collection capacity) rather than attempting to deploy outside corporate infrastructure into remote geographies. The 2027 Needs Assessment should conduct direct on-site feasibility interviews with rural providers.