Kittitas County Solid Waste (Doug Laurent)

Comments on the Draft Washington Preliminary Needs Assessment

RECYCLING REFORM ACT | ECOLOGY PUBLICATION 26-07-077 | OCTOBER 1, 2026 DRAFT

SUBMITTED TO
Washington State Department of Ecology
Solid Waste Management Program

To the Department of Ecology:

Kittitas County appreciates the opportunity to provide comments on the Washington Department of Ecology's Draft Preliminary Needs Assessment under the Recycling Reform Act (RRA). The County supports improvements that increase recycling access, strengthen material recovery, and develop a financially sustainable statewide system.

The draft provides an important statewide baseline. However, the full needs assessment should more fully reflect the operating conditions of rural jurisdictions, particularly the costs and service value of public transfer stations, material-separated drop-off recycling, long-distance hauling, and existing organics management infrastructure. The County offers the following recommendations for consideration in the revised preliminary assessment and the 2027 full needs assessment.

01 Rural recycling costs and financial impacts

The cost analysis relies on a limited set of observations, with substantially different service arrangements among jurisdictions. The draft reports a statewide average of approximately $431.94 per ton and a Central Region average of $504.95 per ton based on nine observations. Those figures are insufficient, by themselves, to establish reliable rural cost benchmarks.

Requested action. Develop a standardized cost methodology that distinguishes urban and rural service models and separately accounts for collection, receiving, sorting, consolidation, transfer, transportation, processing, staffing, equipment, capital investment, and administration. Do not apply the statewide average as a default reimbursement rate without validating actual service costs.

Draft report reference: §4.3, Table 8, p. 28.

02 Recognition of transfer stations and drop-off recycling

For residents without practical curbside service, county-operated transfer stations and drop-off sites often serve as the primary recycling system. The assessment recognizes these facilities but should more explicitly value their ongoing collection, sorting, consolidation, and public-access functions.

Requested action. Document the specific operating and capital needs of existing transfer stations and public drop-off sites, including adequate containers, hardstand and storage space, loading equipment, staffing, site improvements, safe traffic circulation, and collection infrastructure. Treat improvement of existing rural facilities as a core investment option under the RRA.

Draft report reference: §§7.1–7.3, pp. 48–54.

03 Rural service availability and equitable access

The assessment reports lower curbside recycling availability in the Central Region than statewide and correctly distinguishes service availability from actual participation. However, an urban curbside metric alone may not capture the practical service provided by rural drop-off programs—or the barriers faced by residents in geographically dispersed communities.

Requested action. Supplement curbside measures with travel distance, hours of operation, accepted material categories, seasonal demand, accessibility, and actual participation. Recognize cost-effective drop-off collection systems when evaluating rural access and potential investments.

Draft report reference: §6, pp. 37–47.

04 Regional processing infrastructure and transportation

The draft identifies no material recovery facility in Ecology's Central Region. Collection expansion without available regional processing or economical hauling routes could increase costs without producing proportionate recovery gains.

Requested action. Assess the complete transport and processing pathway by material and region, including regional consolidation hubs, direct-to-market source-separated recycling, hauling efficiencies, capital improvements at existing facilities, and realistic processor capacity.

Draft report reference: §§7.3 and 8.3, pp. 53–70.

05 Compostable packaging and protection of compost quality

The assessment identifies limited acceptance of compostable packaging and substantial barriers associated with contamination, sorting, processing, product quality, and access to markets. An organics facility's general permitted capacity does not establish its ability to process covered compostable packaging successfully.

Requested action. Use facility-specific evaluations and pilot demonstrations before recommending broad acceptance of compostable packaging. Include contamination controls, processing efficacy, operating and capital costs, and finished-product market requirements. Preserve the ability of facilities to apply material acceptance standards that protect their operation and compost quality.

Draft report reference: §7.1 and §8.3, pp. 48–70.

06 Producer funding and local government reimbursement

The producer-funded framework offers an opportunity to improve recycling services without shifting new program costs to local governments. The full assessment should be explicit about the eligible costs and timing of any anticipated reimbursement, particularly when local facilities must invest before expanded services can begin.

Requested action. Analyze full eligible costs for county-operated services, including existing infrastructure, staffing, transportation, education, contamination management, recordkeeping, administrative costs, and justified capital upgrades. Explain how those costs will inform the producer responsibility organization's reimbursement approach and future investment priorities.

Draft report reference: §§2.1, 4 and 10.1–10.4.

07 Data quality, consistent reporting, and county consultation

The report acknowledges incomplete provider registration, survey response limitations, inconsistent capacity definitions, and information gaps involving public-place and self-hauled materials. Consequently, reported service availability, collected tonnage, processing capacity, and successful material recovery should not be treated as interchangeable measures.

Requested action. Validate regional service maps and facility inventories directly with county solid waste authorities before using them to set targets or allocate funding. Distinguish material collected from material actually recycled through verified end markets; align reporting terms with existing county and facility datasets and avoid disproportionate administrative requirements.

Draft report reference: §§3.3–3.4 and 10, pp. 17–20, 72–73.

08 Economically sustainable and responsible end markets

The draft identifies limited or absent in-state end markets for several materials, particularly recovered plastics, and recognizes that transportation, commodity specifications, market volatility, and traceability can constrain recovery. Rural collection expansion must be connected to viable downstream destinations.

Requested action. Evaluate the full lifecycle of each covered material from collection through end use. Establish realistic material-specific recommendations that account for transport costs, processing requirements, contamination rates, verified market capacity, and the risk of stockpiling or disposal of material collected for recycling.

Draft report reference: §§8.1–8.3 and 10.5, pp. 60–73.

Closing

Kittitas County supports the goals of the Recycling Reform Act and appreciates Ecology's work to establish a reliable baseline for statewide system planning. Effective implementation should reflect the economic and geographic differences among communities, protect existing public infrastructure, provide equitable opportunities for rural investment, and avoid unfunded shifts in responsibility to local government.

The County requests continued direct engagement with rural solid waste jurisdictions, including Kittitas County, during development of the full needs assessment and subsequent program planning. County operating records and firsthand facility experience can help Ecology validate the Central Region findings and identify practical improvements.

Respectfully submitted,

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