Seattle Public Utilities (McKenna Morrigan)

Comments on draft Preliminary Needs Assessment from Seattle Public Utilities are included in the attached letter. The letter references a report recently published by Seattle Public Utilities, which is also attached and available online here: https://www.seattle.gov/documents/Departments/SPU/AboutUs/Reports/Solid-Waste/City-of-Seattle_2025-Residential-Garbage-and-Recycling-Streams-Compc

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,



McKenna Morrigan
Strategic Advisor – Waste Prevention and Product Stewardship
Solid Waste Planning & Program Management Division
Seattle Public Utilities











City of Seattle

2025 Residential Garbage and Recycling Streams Composition Study

EXECUTIVE SUMMARY

September 2026

Seattle Public Utilities

CASCADIA CONSULTING GROUP

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Executive Summary

The City of Seattle (the City) has been conducting ongoing waste composition studies since 1988 to better understand the make-up of Seattle's solid waste streams and to assess the City's recycling potential. The results of these studies are used to monitor progress toward the City's solid waste goals and meet contractual obligations.

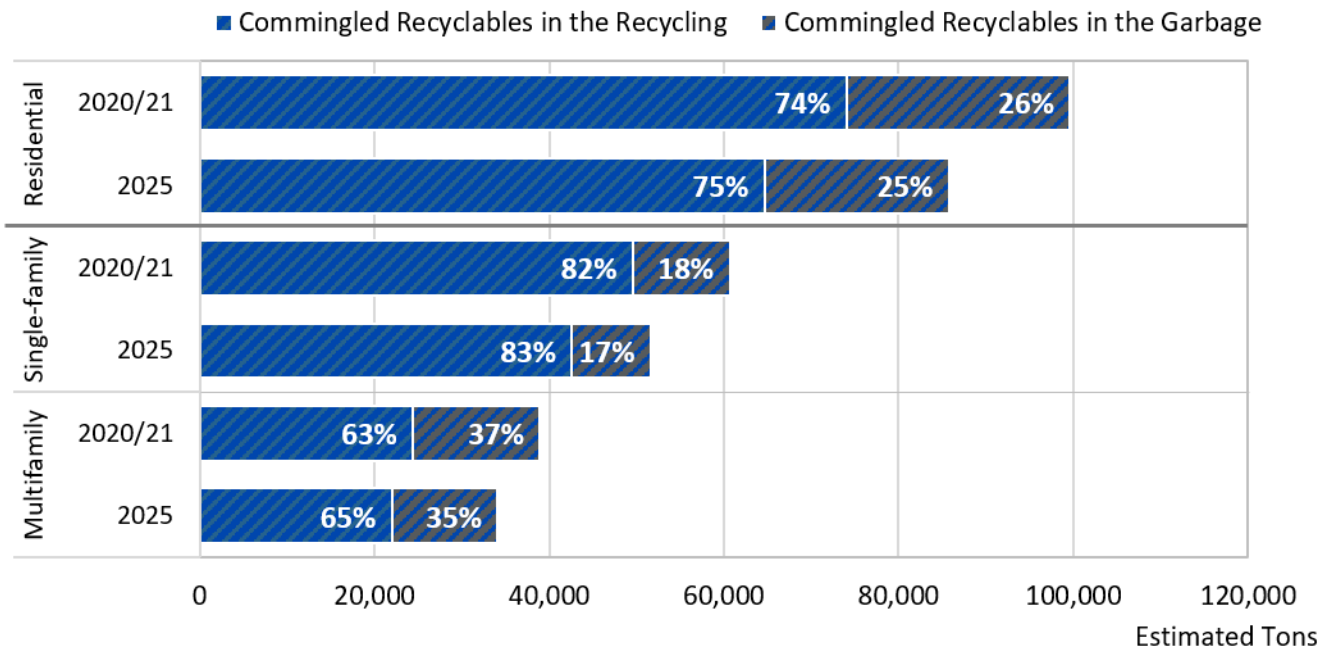
Cascadia Consulting Group (Cascadia) conducted this study in conjunction with Seattle Public Utilities (SPU) in 2025. The study includes residential garbage and recycling streams collected curbside by City-contracted haulers. Cascadia collected residential garbage and commingled recycling samples, including both single-family and multifamily sectors, over three sampling events in 2025 and applied the composition results to 2025 collection tons reported to SPU by franchised haulers. This study also draws comparisons with past residential garbage and recycling composition study results.

Commingled Recyclables Capture Rate Findings

Figure 1 shows the **Commingled Recyclables** tonnage and capture rates estimated by the 2020/21 study and 2025 study findings. Capture rate represents the proportion of **Commingled Recyclable** material (i.e., materials accepted for recycling in the City's residential recycling program) that residents successfully sorted in the recycling stream out of the total amount of **Commingled Recyclable** material generated.

- The residential capture rate of **Commingled Recyclables** increased from 74 percent in 2020/21 to 75 percent in 2025.
  - This means that Seattle residents in 2025 successfully sorted 75 percent of their **Commingled Recyclable** material into the recycling stream, while 25 percent was missorted into the garbage stream.
  - The **Commingled Recyclable** capture rates increased for both the single-family and multifamily sectors.
    - The single-family **Commingled Recyclable** capture rate increased from 82 percent in 2020/21 to 83 percent in 2025.
    - The capture rate of multifamily **Commingled Recyclable** materials in the recycling stream increased from 63 percent in 2020/21 to 65 percent in 2025.
- **Commingled Recyclable** materials in both the residential garbage and recycling streams decreased from 99,620 tons in 2020/21 to 85,750 tons in 2025.
  - The total tons of **Commingled Recyclable** materials decreased for both the single-family and multifamily sectors, from 60,668 tons in 2020/21 to 51,627 tons in 2025 for single-family and from 38,952 tons in 2020/21 to 34,123 tons in 2025 for multifamily.

Figure 1. 2020/21 – 2025 Capture Rates by Sector

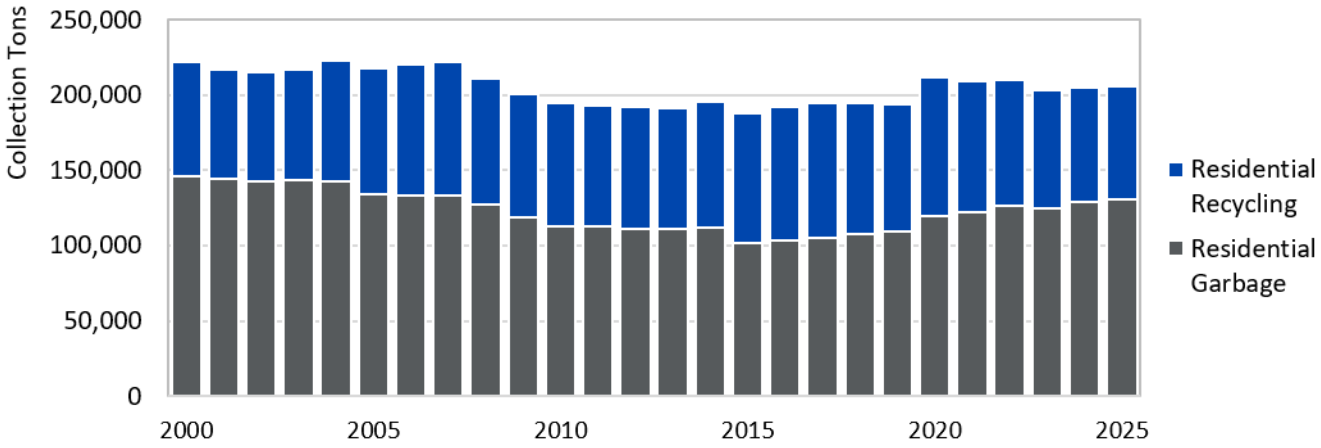


Trends in Residential Garbage & Recycling Collection Tons

Figure 2 shows curbside collection tons of garbage and recycling from the residential sector between 2000 and 2025.

- Residential garbage and recycling tonnage decreased between 2000 and 2025. In 2000, SPU reported a combined total of 222,226 collection tons, compared to 205,654 tons in 2025.
- Residential garbage tonnage decreased from a high of 145,832 collection tons in 2000 to a low of 101,972 collection tons in 2015.
  - In 2025, SPU reported 130,925 residential garbage collection tons.
- Residential recycling tonnage was highest in 2020, with 91,664 collection tons, and has decreased each year since then.
  - In 2025, SPU reported 74,729 tons collected for recycling.
  - Despite a decrease in recycling tonnage in 2025, residential recycling capture rates have increased since the 2020/21 study for both sectors.

Figure 2. 2000 - 2025 Tons by Stream: Residential

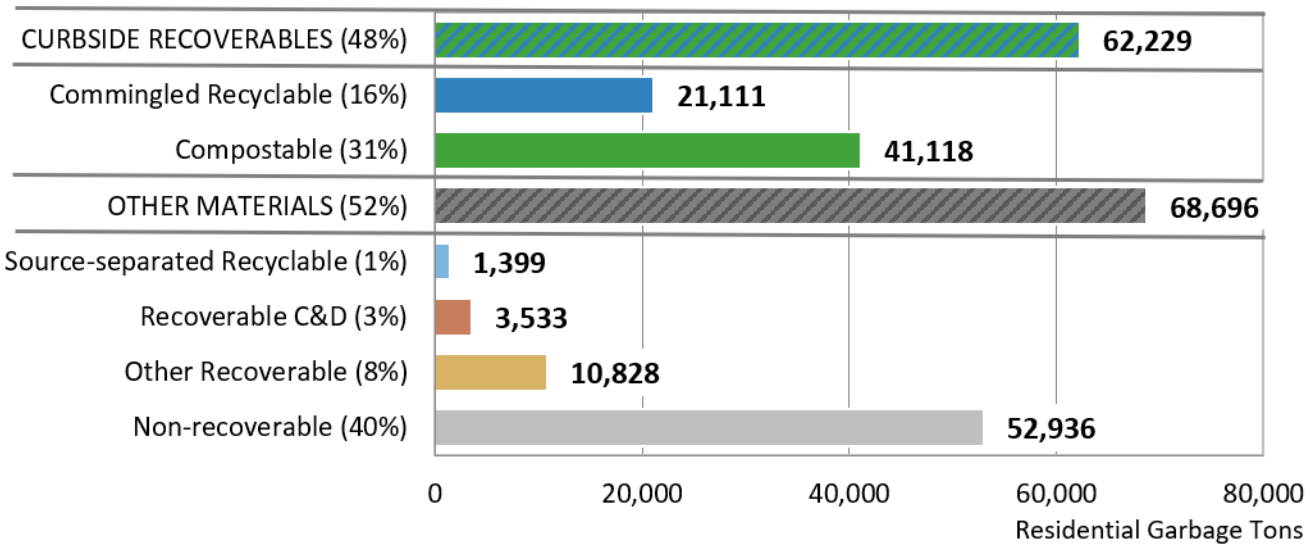


Garbage Study Findings

Figure 3 shows the recoverability class composition for the residential garbage stream, including the subtotals of curbside recoverables that could be recovered through the curbside commingled recycling or composting streams.

- Curbside recoverables accounted for 62,229 tons (48%) of the residential garbage stream.
  - **Commingled Recyclable** materials accounted for 16%, or 21,111 tons.
  - **Compostable** materials accounted for 31%, or 41,118 tons.
- Other materials accounted for 68,696 tons (52%) of the residential garbage stream.
  - **Non-recoverable** materials accounted for the greatest proportion of other materials in the residential garbage stream (40%, or 52,936 tons).
    - Prevalent **Non-recoverable** material types in the residential garbage stream included Diapers & Absorbent Pads, Animal By-products, and Mixed or Other Film.
  - **Other Recoverable** materials accounted for the second greatest proportion of other materials in the residential garbage stream (8%, or 10,828 tons).
    - Prevalent **Other Recoverable** material types in the residential garbage stream included Textiles and Mixed Textiles.
  - **Recoverable C&D** (3%, or 3,533 tons) and **Source-separated Recyclable** (1%, or 1,399 tons) accounted for the remainder of other materials in the residential garbage stream.

Figure 3. Recoverability Class Composition: Residential Garbage

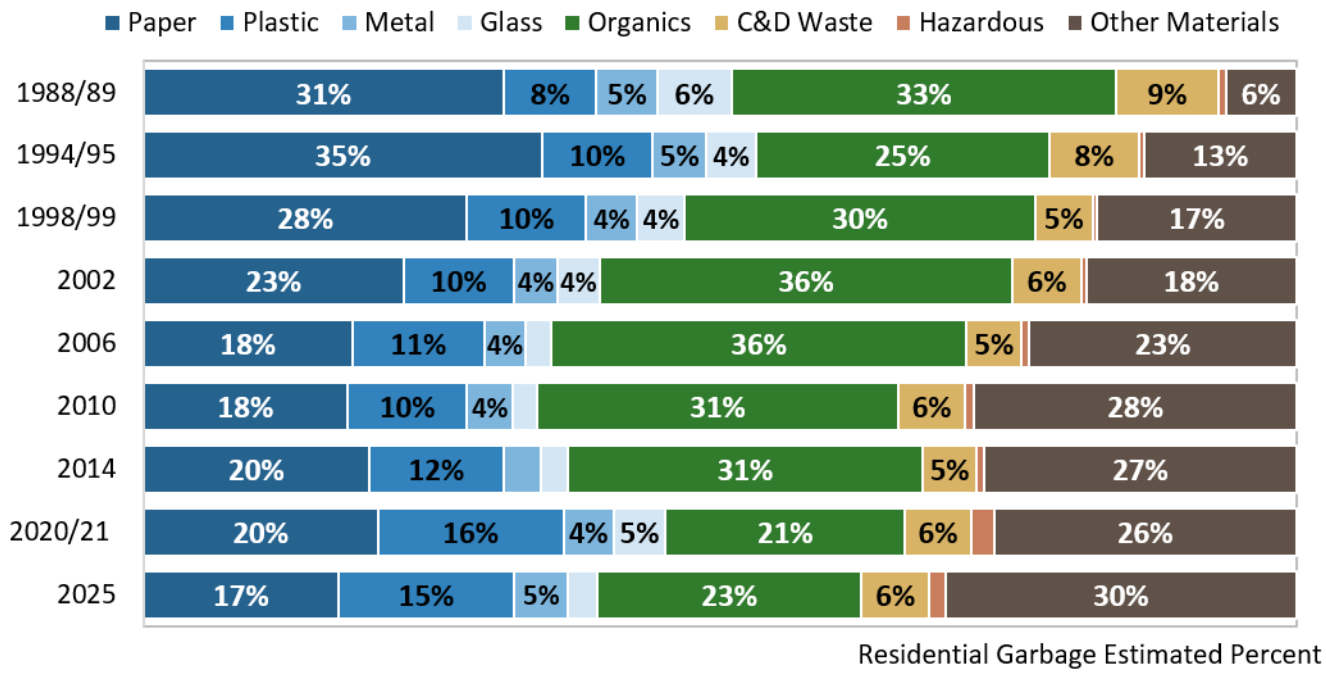


Trends in Garbage Composition

Figure 4 shows the material class composition in each residential garbage study year since 1988.

- **Paper** and **Organics** were the most prevalent material classes from the 1988/89 study to the 2002 study.
- From the 2006 study to the 2025 study, **Organics** and **Other Materials** were the two most prevalent material classes in the residential garbage stream.
- **Paper** has decreased from 1988/89 to 2025, from 31% to 17%.
- **Plastic** has increased from 1988/89 to 2025, from 8% to 15%.
- **Other Materials** has increased from 1988/89 to 2025, from 6% to 30%.
- **Metal, Glass, C&D Waste**, and **Hazardous Materials** each continue to represent a relatively small proportion of the residential garbage stream across all study years.

Figure 4. 1988 – 2025 Material Class Composition by Study Year: Residential Garbage

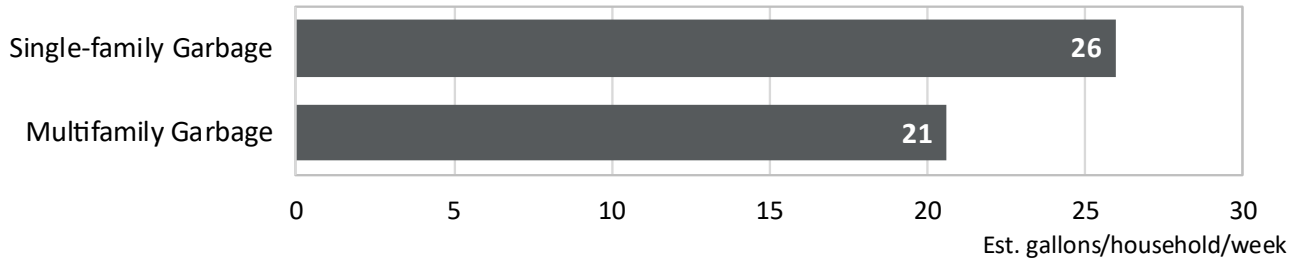


Estimated Garbage Generation Rate

Figure 5 shows the average generation rate of garbage in gallons per household per week for each sector.

- The average single-family generation rate was 26 gallons per household per week.
- The average multifamily generation rate was 21 gallons per household per week.

Figure 5. Stream Generation Rate: Residential Garbage

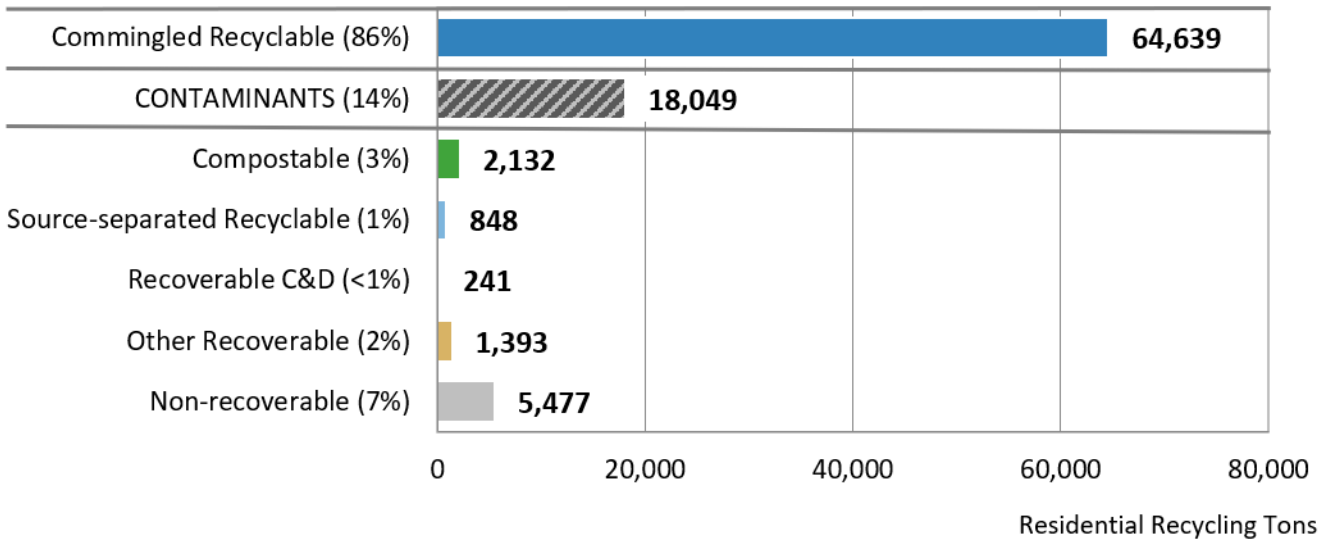


Recycling Study Findings

Figure 6 shows the recoverability class composition of the residential recycling stream, including collection tons and proportion of the stream for each recoverability class.

- **Commingled Recyclable** materials accounted for 64,639 (86%) of the residential recycling stream.
- The remaining portion of the stream (14%, or 18,049) was contaminant material, including:
  - **Non-recoverable** materials (7%, or 5,477 tons), which accounted for the second greatest proportion of the residential recycling stream.
    - Prevalent **Non-recoverable** materials in the residential recycling stream include Non-distinct Fines and Mixed or Other Paper.
  - **Compostable** materials (3%, or 2,132 tons), which are curbside recoverable materials but are not accepted in the residential recycling stream.
    - Prevalent **Compostable** materials in the residential recycling stream include Compostable Single-use Food Service Packaging and Packaged Edible Food.

Figure 6. Recoverability Class Composition: Residential Recycling



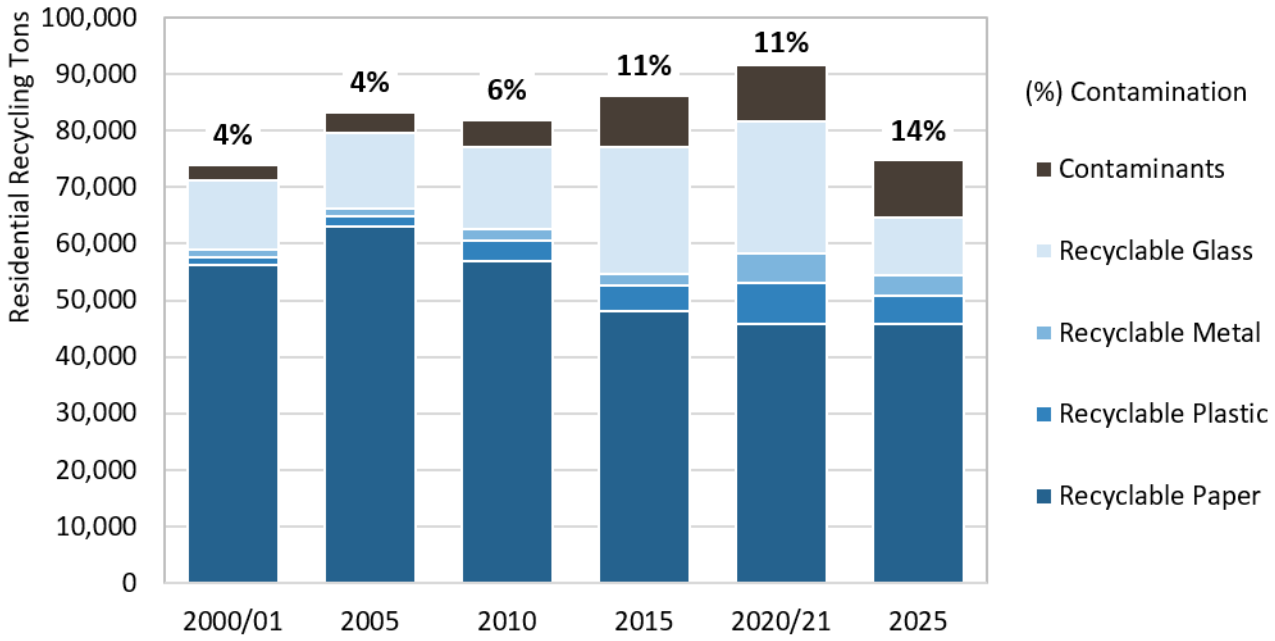
Trends in Recycling Composition

Figure 7 shows estimated tons of residential recycling by recoverable material class and for contaminants.

- **Recyclable Paper** continues to be the most prevalent material class, as it has been since the first recycling study in 2000/01; it consistently makes up more than half of collected commingled recycling.
- 2025 is the first year since 2000 that the proportion of **Recyclable Plastics** has not increased. The 5,002 tons of **Recyclable Plastic** estimated for 2025 was a decrease from the 7,227 tons estimated for 2020/21.
- The estimated tons of **Recyclable Glass** decreased to 10,104 tons in 2025, from 22,542 tons in 2015 and 23,270 tons in 2020/21.

- The contamination rate has continued to increase since the 2000/01 study. The contamination rate in 2025 was 14 percent, compared to 11 percent estimated in the 2015 and 2020/21 studies.

Figure 7. 2000 – 2025 Class Composition: Residential Recycling



Residential Recycling Generation Rate

Figure 8 shows the average generation rate of recycling in gallons per household per week for each sector.

- The average single-family generation rate was 23 gallons per household per week.
- The average multifamily generation rate was 10 gallons per household per week.

Figure 8. Stream Generation Rate: Residential Recycling

