Methow Recycles (CASEY BOUCHARD)

FORMAL COMMENTS ON THE DRAFT PRELIMINARY NEEDS ASSESSMENT

TO: Washington State Department of Ecology (Solid Waste Management Program)

FROM: Casey Bouchard, RRA Advisory Council Member representing Methow Recycles (Recycling Facilities)

DATE: October 30, 2026

SUBJECT: Technical Feedback on Draft Preliminary Needs Assessment (Publication 26-07-077)

1. Facility Classification: Statutory Definition of "MRF" vs. Rural Processing Nodes (Section 7.0 & Table 24)

- **The Issue in the Draft:** The draft assessment restricts its formal inventory of Material Recovery Facilities (MRFs) exclusively to the "Big 7" automated single-stream facilities, indicating zero MRFs in the Central region (Table 24, Figure 13). Comprehensive recycling operations like Methow Recycles are consequently categorized merely as "drop-off collection sites" or secondary transfer nodes (Table 22).
- **Operational Reality & Statutory Alignment:** Under RCW 70A.208.020, an MRF is defined as *"any facility that receives, compacts, repackages, or sorts source-separated solid waste for the purpose of recycling"*. Permitted under WAC 173-350, Methow Recycles receives inbound materials from self-haulers and commercial routes, conducts manual sortation, densifies and bales commodities to ISRI specifications, and directly markets and brokers these materials to primary end markets.
- **Required Recommendation:** Ecology must formally define and recognize an intermediate category—**Decentralized Processing Facilities (or "Mini-MRFs")**. Treating staffed baling hubs identically to unstaffed drop-off roll-offs at transfer stations overlooks substantial in-state sorting and densification capacity and risks underfunding these facilities during future PRO reimbursement rate setting.

2. Regional Mapping & Rural Access: Accounting for Frontier Performance and Tourism (Section 6.0 & Figure 8)

- **The Issue in the Draft:** The service-level evaluation and gap analysis maps (Figures 8, 10, and 11) characterize large portions of Central and Eastern Washington as service voids based almost entirely on the single metric of curbside garbage

matching (identifying 28% of Central single-family residences as having curbside garbage without curbside recycling).

- **Operational Reality:** In low-density, remote mountainous valleys, commingled curbside collection can be logistically and economically inefficient due to long haul routes, pass closures, and compaction that degrades fiber quality. In contrast, established source-separated drop-off networks deliver contamination rates below 2%, outperforming typical urban commingled streams.
- **Accounting for Seasonal Tourism:** The geographic access analysis relies strictly on Census block residential baselines, failing to account for seasonal populations. **For example, the Town of Winthrop has a year-round population of approximately 800, but has more than 200,000 annual visitors, all of whom generate recyclable materials while visiting.**
- **Required Recommendation:** The final Needs Assessment maps must distinguish between unserved areas and regions effectively served by **high-performing, source-separated depot hubs**. Generation and capacity models for rural destination communities must incorporate seasonal visitor and tourist volumes.

3. End Market Omissions: Recognizing Vital Regional Fiber Outlets (Section 8.0 & Table 30)

- **The Issue in the Draft:** Section 8.0 concludes that Washington has limited in-state capacity for lower-grade mechanical pulp and mixed paper, noting substantial reliance on export markets (Table 27, Table 29). Table 30 lists six in-state paper manufacturing end markets but omits key regional capacity in Central Washington.
- **Operational Reality:** The inventory omits **TekniPlex (formerly Keyes Packaging Group) in Wenatchee**. TekniPlex operates the largest molded-fiber manufacturing plant on the West Coast, consuming significant volumes of regional post-consumer cardboard and recovered fiber to manufacture fruit pack trays for the regional tree-fruit industry as well as egg cartons.
- **Required Recommendation:** Add TekniPlex in Wenatchee to Table 30 as an established in-state manufacturing end market for recovered fiber, highlighting its role as a regional closed-loop outlet.

4. Capital Buildout & Service Provider Engagement in Remote Geographies (Sections 7.3 & 10.4)

- **The Issue in the Draft:** Section 7.3 notes that 33% of drop-off sites report the ability to expand capacity with additional containers, staffing, and equipment, while transfer stations face operational bottlenecks, site constraints, and rolling stock limits.
- **Operational Reality:** Meeting the service expansion goals of the RRA in rural areas cannot rely solely on standard urban curbside templates or deploying external corporate infrastructure. Existing local operators already maintain the collection networks, site footprints, and community trust required to scale service.
- **Required Recommendation:** Recommendations in Section 10.4 must direct the 2027 Needs Assessment to **prioritize capital upgrade investments for existing, willing local service providers** (e.g., funding balers, container capacity, and processing floors) before considering greenfield systems. The Phase 2 assessment should incorporate direct on-site interviews with rural service providers to evaluate facility readiness.