Sage Schmalz

Hello,
Please see attached file for comments from Snohomish County - Solid Waste Division regarding the draft Preliminary Needs Assessment prepared for the Recycling Reform Act.
Thank you,
Sage Schmalz

TO: Dept. of Ecology, public comment period on draft Preliminary Needs Assessment
October 23, 2026

Thank you for the opportunity to comment on the draft Preliminary Needs Assessment for the Recycling Reform Act. Snohomish County Solid Waste supports improved recycling outcomes statewide and would like to emphasize the importance of addressing several key data gaps identified in the assessment.

Support for Data-Gathering Efforts & Collaboration Request, Sections 7 & 10

First, we support Ecology's planned efforts to fill these critical gaps. Snohomish County Solid Waste looks forward to ongoing collaboration and remains ready to contribute operational data, practical experience, and local insights to support the development of workable, effective statewide recycling solutions. We welcome Ecology to coordinate with the planner assisting with Recycling Reform Act efforts, Sage Schmalz, to arrange a site visit. Such a visit will help ensure Ecology has a clear understanding of our operational considerations, which are essential for the successful implementation of the proposed requirements.

We concur with many of the findings related to service providers, including the need for site expansion to support storage, staging, and safe maneuvering of commodities; new containers for materials we have not previously collected; potential new equipment for staging, maneuvering, and sorting; and additional staffing to operate Recycling Stations and deliver commodities to MRFs.

Standardizing the Definition of Responsible Markets, Section 8

We also support ongoing work to standardize the definition of "responsible markets" and to provide consistent guidance for service providers evaluating the responsibility of their end markets. A standardized definition across statute and with the UTC is essential to reduce conflicting interpretations. While not strictly data-related, this represents a significant knowledge gap within the industry.

Clarification Needed on Collection Methods & Infrastructure Support, Sections 6 & 7

We would appreciate greater clarity on which entity will determine how commodities must be collected—specifically whether certain items may be collected commingled, and if not, whether the PRO will support infrastructure improvements that

MRFs may require in order to accommodate this method of collection. Allowing commingled collection would reduce operational burdens, increase processing capacity, and help alleviate space constraints by replacing some single-stream bins with commingled bins, particularly for materials that are difficult for the public to sort, such as various plastic types. At the same time, we encourage maintaining local flexibility to meet unique operational needs, while welcoming Ecology's insights into best practices for collecting materials with which we have less experience.

We also encourage aligning decisions about collection methods with the parallel WAC 173-350 and 351 rulemaking work to standardize definitions such as commingled materials, recyclable materials, and residuals. Consistent terminology across programs will reduce operational uncertainty for service providers and support local planning, permitting, and compliance efforts.

Importance of Closing Data Gaps for Planning Needs, Sections 3.4, 7, & 10

As stated previously, closing these data gaps is imperative for fully understanding the downstream implications of the Recycling Reform Act and for accurate planning. Snohomish County Solid Waste has identified multiple capital improvement projects necessary to support our growing population, replace aging infrastructure, and comply with new RRA requirements, such as improvements to a high-use rural drop box location and the development of a dedicated recycling station co-located with a new transfer station to streamline material management. Clarity on key elements, such as the potential for commingling certain materials, will significantly improve the accuracy of our space and resource planning. The assessment should also account for facility planning, permitting, and construction lead times to ensure implementation schedules are realistic and new requirements do not precede necessary infrastructure.

Where data remain incomplete, the assessment should clearly identify key assumptions and uncertainties that could affect local infrastructure and investment decisions.

Combined Impacts of Recycling and Organics Initiatives, Sections 7 & 8

Lastly, we encourage the next draft of the assessment to explore in greater depth the combined implications of multiple recycling and organics initiatives being proposed simultaneously, as well as the impacts of changes to several solid waste definitions under WAC 173-350 and 351. For example, if a commodity lacks a responsible end market and is

deemed non-recyclable, what are the implications for a facility's residual measurement, recovery rate, and its classification as a Transfer Station or Material Recovery Facility?

We appreciate the opportunity to provide input and look forward to continued collaboration as this important work progresses.