



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Region Office

PO Box 330316, Shoreline, WA 98133-9716 • 206-594-0000

June 7, 2023

Stephanie Schwenger, MPA
Solid and Hazardous Waste Lead Planner
Seattle Public Utilities
PO Box 34018
Seattle, WA 98124-4018

Re: Ecology Approval of Seattle's 2022 Solid Waste Plan Update: Moving Upstream to Zero Waste (2022-2027)

Dear Stephanie Schwenger:

Ecology is pleased to approve Seattle's Solid Waste Management Plan, *2022 Solid Waste Plan Update: Moving Upstream to Zero Waste (2022-2027)*, (Plan) transmitted to us on April 26, 2023.

Ecology appreciates Seattle's continued leadership in sustainable materials management, and the thoughtful approach the City and its stakeholders took to updating the Plan. The 7 goals and 39 recommendations in this Plan support other plans such as the [Washington State Solid and Hazardous Waste Management Plan](#) (2021) and the [Seattle Climate Action Plan](#) (2013). Some elements of the Plan are particularly strong. For example, the Plan:

- Recognizes the preeminence of impacts from used and discarded materials throughout their life cycle, and places sustainable materials management over a traditional end-of-life focus. (e.g. page 1.12, goal 3 of the Plan on page 1.20)
- Emphasizes waste prevention in solid waste system planning and explores ways beyond the recycling rate to measure the results and success of programs. Considerations include environmental impact, economics, and social equity. The Plan recognizes that responsible materials management is a means to achieve larger goals, and not an end in itself. (e.g. Chapters 2 and 3, Appendices E and F, the City Council Resolution of Adoption requirement for a report by December 31, 2024 to identify the new metrics that will be used to quantify waste reduction and diversion in Seattle and thus supersede current recycling rate goals)
- Holds racial equity as a center point for all solid waste programs. (e.g. Recommendation 1 of the Plan on page ES.3, goal 1 of the Plan on page 1.20, page 1.24, Chapter 9)

- Prepares for vulnerabilities via a risk and resiliency framework and alignment with other Seattle plans such as the *Disaster Debris Management Plan*. (e.g. pages 1.25 and 7.26)
- Honestly discusses the risk of increasing environmental and human harm globally when exporting materials meant for recycling. The Plan reflects on and recommends regional partnerships and local policies or strategies that could mitigate this. (e.g. page 1.19, goals 3-7 on page 1.20 (when goal 5 considers global recycling facilities supported by Seattle Public Utilities' actions), the recommendations on page 5.14 and Chapter 5)
- Is well written and thoroughly describes the solid waste system, efforts along the life cycle of various materials, and the data used to support the strategies in use or under consideration. The Plan uses clear language and avoids repetition by directing readers to where the Plan discusses various topics in greater detail.
- Dedicates an entire chapter to construction and demolition debris, and a significant part of Chapter 6 to litter. Such emphasis in plans is unusual statewide, even though construction and demolition debris makes up a significant portion of discarded materials statewide, and litter-related issues are currently generating a lot of complaints and attention. For present-day Seattle, these especially are key areas. (e.g. page 6.24 and the recommendation on page 6.30, Chapter 8)

As we celebrate completion of this Plan and turn to implementation of it, Ecology encourages Seattle to use its position as a leader to help bring transparency to recycling, since collection at the curb is not equivalent to use of those materials in new products. Seattle has lobbied for extended producer responsibility, which may help achieve this goal, as well as the goal of a more uniform accepted recyclables list either regionally or statewide. Currently, Ecology suggests caution about the breadth of materials accepted in Seattle's blue bins, which is echoed by other stakeholders in places such as pages D.28, D.29, and D.32, and by the [Responsible Recycling Task Force](#), which the Plan references in various places and supports in Recommendation 13. This [Residential Recycling Survey](#) reflects what materials are accepted statewide, and may provide data helpful for your decision making.

This is a big plan with a lot of exciting potential, and Ecology looks forward to its implementation. We stand ready with our partnership to support implementation as able.

Sincerely,



Steven Williams
Northwest Region Section Manager
Solid Waste Management Program

cc: Peter Guttchen, Statewide Lead Planner, Ecology
Diana Wadley, Northwest Region Planner and Grant Manager, Ecology