Environmental Review of the Model Ordinances for Organic Material Management

State Environmental Planning Act (SEPA) Checklist

Solid Waste Management Program
Washington State Department of Ecology
Lacey, WA

December 2024

DEPARTMENT OF
ECOLOGY
State of Washington

State Environmental Planning Act (SEPA) Checklist

Purpose of checklist

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization, or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. **You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown.** You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to **all parts of your proposal**, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for lead agencies

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B, plus the Supplemental Sheet for Nonproject Actions (Part D). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in "Part B: Environmental Elements" that do not contribute meaningfully to the analysis of the proposal.

Background

Find help answering background questions[1]

1. **Name of proposed project, if applicable:**

   Model Ordinances for Local Governments to Divert Organic Materials and Reduce Methane Emissions from Landfills

2. **Name of applicant:**

   Washington State Department of Ecology – Solid Waste Management Program – Policy Section

3. **Address and phone number of applicant and contact person:**

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   Policy Section, Solid Waste Management
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   360-485-2724

4. **Date checklist prepared:**

   November 16, 2024 – December, 31 2024

5. **Agency requesting checklist:**

   Ecology

6. **Proposed timing of schedule (including phasing, if applicable):**

   Ecology plans to adopt and publish the model ordinances shortly after the comment period closes on Jan. 28, 2025, for this environmental review. This project offers draft language to local governments to help them reduce organic materials going to the landfill and divert organic materials to make compost or another useful product. The three ordinance topics include:

   - Mandatory curbside organic waste collection for single-family residences and certain businesses within the state-determined areas known as the Business Organics Management Area (BOMA) and Organics Recovery Collection Area (ORCA) (this is required by state law);
   - Organic waste management at special events (to be included as part of local permit applications for such events); and
   - Siting for solid waste collection, including organic waste, as part of building permits, when applicable.

   Adopting the model ordinances is optional. However, local jurisdictions will need to adopt a local ordinance or amend their code to comply with the requirements of RCWs 70A.205.540 and .545. Parts of 70A.205.545 RCW are in effect now and .540 will begin April 1, 2027. Ecology anticipates that incorporated areas (cities) will be able to pass ordinances within 2-3 years, while unincorporated areas may take closer to five.

[1] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-A-Background

Both laws require curbside organics collection service. Section .545 requires businesses within the Business Organics Management Area to subscribe to organics collection service if they generate above a certain volume of organic waste per week, including food waste. The threshold decreases over time from 8 cubic yards (2024), 4 cubic yards (2025), to 96 gallons (2026).

Section .540 requires the city or county to offer curbside organics collection to all single-family residences and non-residential customers that generates more than 0.25 cubic yards (96 gallons) of organic waste per week located within the Organics Recovery Collection Area (ORCA). By 2030, this service must include food waste as an accepted material and become non-elective for affected residents and businesses.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

There are no plans to add or expand on the model ordinance at this time. Local jurisdictions will be further refining and adapting this language to make it fit their needs while still complying with the Organics Management Law and participating in the state's goal to decrease organic materials going to landfill (RCW 70A.205.007).

If resources are available, it is possible Ecology could modify the model ordinance language if legislation, rules, or other factors change the Revised Code of Washington (RCW) related to the organic materials and recovery requirements.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

Ecology convened a stakeholder advisory committee as part of drafting the model ordinances, which met five times virtually to select the ordinance topics. Each member brought their independent policy research and expertise from a range of industry sectors. The advisory committee provided feedback and answered five additional surveys related to the model ordinance draft language. The committee selected seven ordinance topics to send to the Washington State Office of the Attorney General, who selected the three final topics.

Ecology staff reviewed organics management policies and (dis)incentives from across the world. They summarized findings and shared with the advisory committee as part of their discussions. (See Appendix B).

Landfills are a significant source of methane emissions, a potent greenhouse gas. According to the U.S. Environmental Protection Agency, municipal solid waste landfills are the third largest contributor to methane emissions (U.S. EPA, 2024). Organic materials in landfills are the source of methane generation, and these materials could be diverted for a higher and better use, including composting, that would create environmental benefits and economic opportunities.

Nearly 40% of the materials in Washington State landfills are organic and could be considered recoverable (WA Department of Ecology, 2021). Reducing organic materials in landfills is necessary to achieve the state's 2030 goal of reducing disposed organic materials by 75% (RCW 70A.205.007).

Washington's Organic Management Laws require some businesses to arrange for organics collection (RCW 70A.205.545) and for local jurisdictions to provide year-round organics collection service to single-family and certain non-residential customers by April 1, 2027. By April 1, 2030, this

organics collection service must be non-elective (waivers are available) and include collecting food waste (RCW 70A.205.540).

In addition, studies of food waste at special events and attendee behavior related to waste were gathered. These were limited to two papers based outside the United States: Martinho *et al.*, 2018 and Zhang *et al.*, 2021.

Ecology used several guidance documents and other sources from regulatory agencies to develop the model ordinance topics and language, including but not limited to:

Solid Waste Handling Standards or Chapter 173-350 WAC (WA Department of Ecology) – These are the rules that govern handling solid waste, including organic materials, in Washington State. There is currently an open rulemaking to address contamination at organic management facilities. With more food waste entering facilities, facility staff see more contamination from plastic, glass, and other non-compostable materials.

The U.S. Environmental Protection Agency is the national leader in researching and reporting on food waste and its environmental impacts. Some of their key research reports used for this project are "Environmental Impacts of Food Waste Part 1 and Part 2" and "Quantifying Methane Emissions from Landfilled Food Waste." These meta-analyses look at available data to quantify and understand the environmental impacts of food loss and food waste, including the wasted water, emissions and other resources related to growing and transporting food. These reports also offer insight on current data gaps and potential benefits from reducing food loss and waste and recovering food waste to make compost, digestate, and other commodities.

The U.S. EPA also reports on emerging issues relevant to organics management and facilities including pre-processing technologies, plastic contamination, and persistent chemical contaminants.

The Use Food Well Washington Plan was a collaborative effort of five cabinet agencies in Washington State that provided 30 recommendations to prevent food loss and waste while better managing what is wasted.

Since this project involved drafting legislative language for local governments, municipal codes and other state resources were also used including but not limited to:

Special Event Model Ordinance – Seattle (Washington), Spokane (Washington), Sequim (Washington), Austin (Texas), San Francisco (California), California State, Boulder (Colorado), Telluride (Colorado), and New York City

Mandatory Organics Collection – Camas (Washington), Anacortes (Washington), Alameda County (California), San Francisco (California), Los Angeles (California), San Jose (California), Boulder (Colorado), Mountain Village (Colorado), the State of Massachusetts, and California's Model Mandatory Organic Waste Disposal Reduction Ordinance

Building Design and Siting for Solid Waste – Flagstaff (Arizona), Palo Alto, and the Natural Resources Defense Council

9. **Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.**

The proposal is **not** project or site specific. This project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities.

Note: RCW 70A.207.030 allows local governments who adopt the model ordinance to use this SEPA review instead of each jurisdictions getting their own. Local governments who change the model ordinance may need to seek additional SEPA review. Additionally, SEPA review does not substitute any local administrative requirements for passing an ordinance such as a public meeting to discuss the economic impacts on small businesses, residents, etc.

10. List any government approvals or permits that will be needed for your proposal, if known.

Not applicable. Two of these model ordinances would add new requirements or information needed for local jurisdictions to approve permits (special events and building/construction).

Local governments will need to pass a new or amend an existing ordinance to implement the curbside organics collection, which is required by state law in certain places (i.e., the BOMA and ORCA).

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

Ecology drafted three model ordinances with the help of an Advisory Committee and the Office of the Attorney General to disincentivize the disposal of organic materials in the landfill, per RCW 70A.207.030. A SEPA review of the model ordinances is required, and if local jurisdictions adopt the model ordinance, they do not need to get a review locally. Adopting or using the model ordinances is optional. Their purpose is to reduce methane emissions by supporting cities and counties in Washington to implement the Organics Management Law and divert organic waste from the landfill.

Two of the model ordinances are related to permits granted by cities or counties.

Special events are activities that generate waste, with the waste made and left by attendees recognized as the most significant impact of special events (Martinho et al., 2018). Some research suggests special event attendees generate about 4.2 pounds of solid waste per day including food waste (Shang et al., 2021) when food is served at the event. The special event model ordinance creates a local Center for Events; requires a waste reduction, diversion, and management plan for special events; requires a waste management training for event organizers; and creates a list of local waste prevention and reduction specialists.

While multi-family residences are not included in RCW 70A.205.540 nor RCW 70A.205.545, multi-family housing generates significant organic materials. Sustainable development includes new buildings designed for organic materials collection as part of permit approval. The building design ordinance requires all new building permit applications to provide an assessment of the anticipated waste to be created at the final site. If there is expected to be more than 0.25 cubic yards of organic material produced (such as in a residential use property), then designs would need to include areas

for the management, storage, and collection of organic and other solid waste for a permit to be approved.

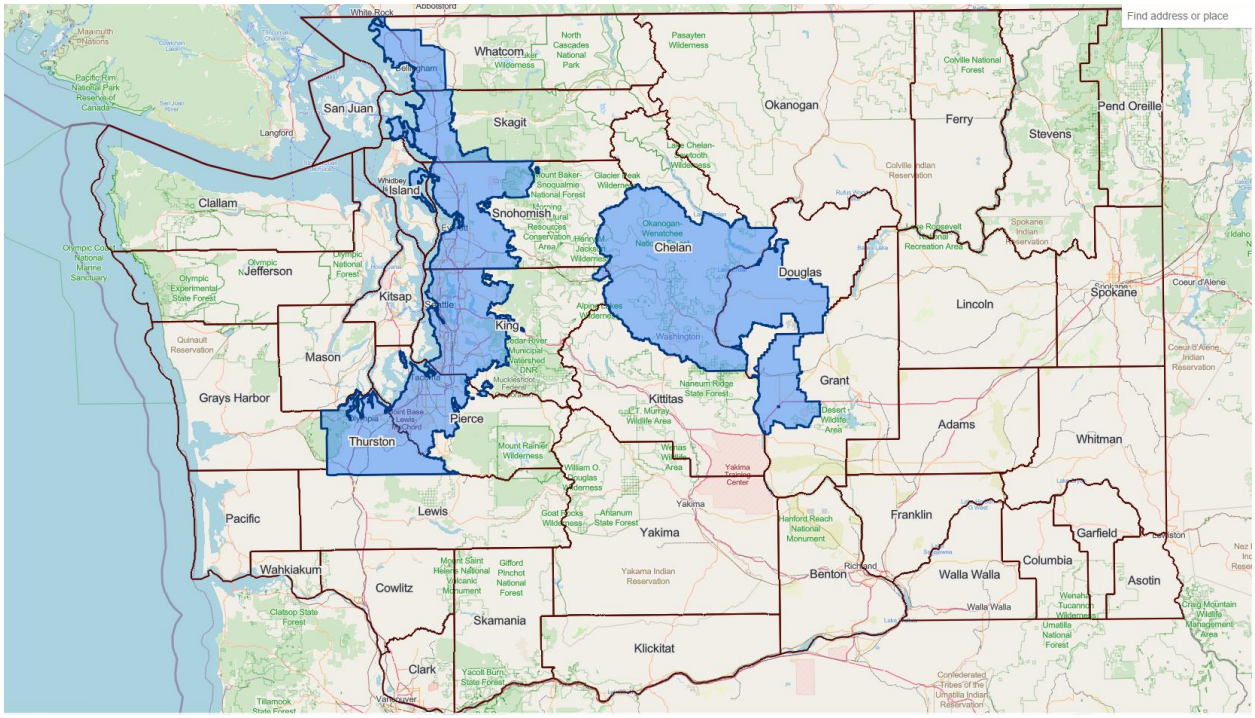
The other model ordinance is for mandatory curbside organics collection for residents and businesses in certain areas of the state per RCWs 70A.205.540 and .545. Washington's Organic Management Laws require some businesses to arrange for organics collection (RCW 70A.205.545) and for local jurisdictions to provide year-round organics collection service to single-family and certain non-residential customers by April 1, 2027. By April 1, 2030, this organics collection service must be non-elective (waivers are proposed in the ordinance) and include collecting food waste (RCW 70A.205.540).

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

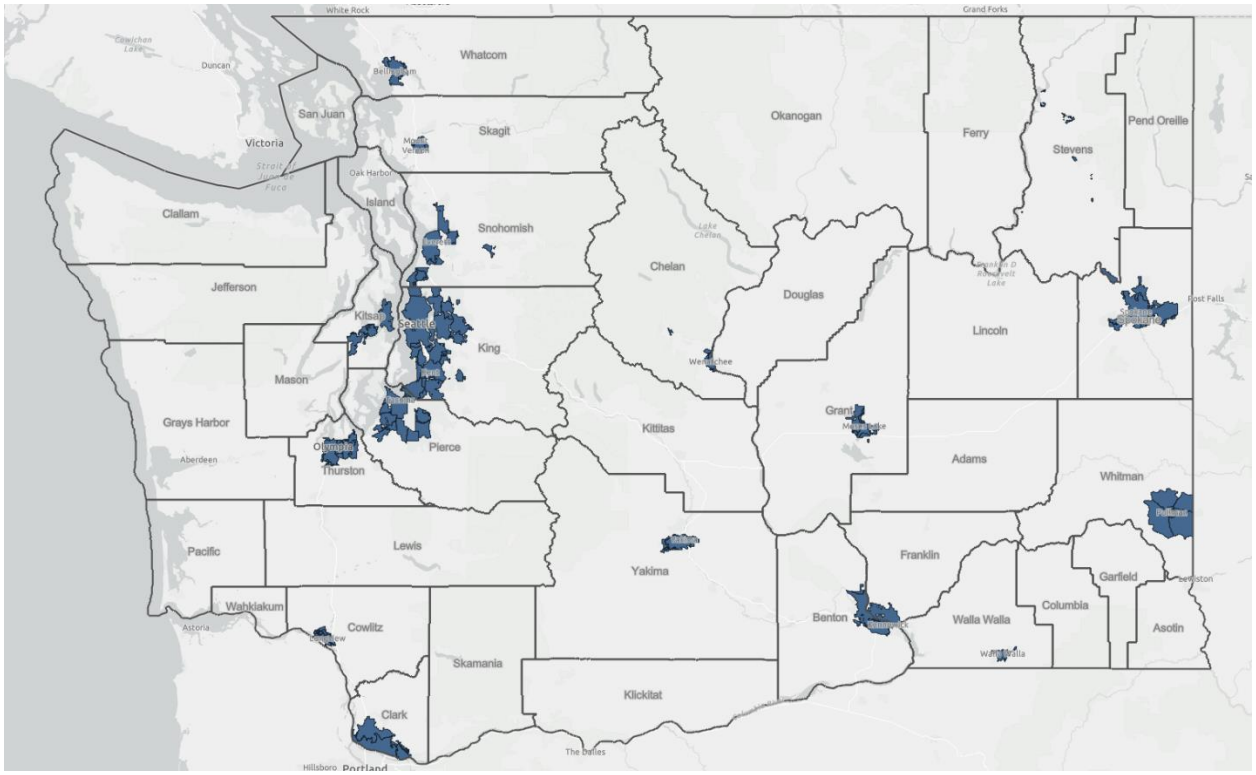
The model ordinances are available to any jurisdiction in Washington State, although they do not have to use the model ordinances. Neither the special event ordinance nor the building siting ordinance is required by state law. However, they do support Washington's goal of diverting organic waste from the landfill, which is why they were selected as model ordinance topics.

Mandatory curbside organics collection service is required in certain areas of the state.

Businesses located within the BOMA (mapped in blue below) are required to subscribe to organics collection service starting in 2024. The BOMA is based on available collection service and organic material processing capacity in the area. Ecology updates the map each summer. The number of businesses within the BOMA increases each year as the threshold for organic materials drops from 4 cubic yards (2025) to 96 gallons (2024). New facilities or expansions could also increase the size of BOMA in future years.



By 2027, local governments operating within the Organics Recovery Collection Area (ORCA) must begin offering curbside organics collection service for all single-family residents and non-residential customers that generate more than 0.25 cubic yard of organic waste per week. The draft ORCA map is below. The ORCA is determined based on population and includes jurisdictions with more than 25,000 residents; census tracts with population density of more than 75 people per square mile; and Urban Growth Areas (incorporated and unincorporated) planning under the Growth Management Act). The ORCA map should be published in early 2025 and will be updated each summer.



Environmental Elements

The proposal is **not** project or site specific. This project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities.

Note: RCW 70A.207.030 allows local governments who adopt the model ordinance to use this SEPA review instead of each jurisdictions getting their own. Local governments who change the model ordinance may need to seek additional SEPA review. Additionally, SEPA review does not substitute any local administrative requirements for passing an ordinance such as a public meeting to discuss the economic impacts on small businesses, residents, etc.

1. Earth

Find help answering earth questions[2]

a. General description of the site:

Does not apply. The proposal is **not** project or site specific.

[2] https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-earth

Circle or highlight one: Flat, rolling, hilly, steep slopes, mountainous, other:

b. What is the steepest slope on the site (approximate percent slope)?

Each local area is unique in its geography. This would include special event locations, organics collection routes, and distances to processing facilities.

With the special events and mandatory organics collection model ordinances, these activities would take place on existing roads or at existing facilities and venues. The building permit ordinance would add new requirements to the local permit applications, so the local government has a mechanism in place to assess risks related to soil and pedology on a case-by-case basis.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them, and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

Each local area is unique in its geography. This would include special event locations, organics collection routes, and distances to processing facilities.

With the special events and mandatory organics collection model ordinances, these activities would take place on existing roads or at existing facilities. The multi-building permit ordinance would add new requirements to the local permit applications, so the local government has a mechanism in place to assess risks related to soil and pedology on a case-by-case basis.

This nonproject action will not result in the removal of agricultural soils.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

Each local area is unique in its geography. This would include special event locations, organics collection routes, and distances to processing facilities.

With the special events and mandatory organics collection model ordinances, these activities would take place on existing roads or at existing facilities. The building permit ordinance would add new requirements to the local permit applications, so the local government has a mechanism in place to assess risks related to soil and pedology on a case-by-case basis.

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

Does not apply. The proposal is **not** project or site specific.

f. Could erosion occur because of clearing, construction, or use? If so, generally describe.

Does not apply. The proposal is **not** project or site specific.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

Does not apply. The proposal is **not** project or site specific.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any.

The proposal is **not** project or site specific. This project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities.

The goal of this non-project action is to divert organic materials away from the landfill and recover the carbon and nutrient to make a useful product such as compost. Applying compost is one way to prevent erosion and is commonly used by the Washington Department of Transportation. Compost helps prevent erosion in the short-term while also helping plants establish for long-term erosion control.

Not all land is appropriate for compost application including wetlands and National Parks. Current laws disallow the use of compost in these vulnerable areas and are considered when determining if a site is appropriate for compost application locally.

2. Air

Find help answering air questions[3]

a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

The proposal is **not** project or site specific. This project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

For the mandatory organics collection model ordinance, foreseeable emissions would come from hauling trucks who will have more routes, customers, and tonnage of organic materials they transport to an organics management facility.

Organics management facilities will be processing larger volumes of organic materials, and these facilities release some methane. Anglou et al. (2024) report that composting food waste produces 38-84% less methane compared to putting it in the landfill.

[3] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-Air

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

Organics management facilities can release nuisance odors, particularly when they accept food waste.

c. Proposed measures to reduce or control emissions or other impacts to air, if any:

All the model ordinances are designed to facilitate diverting organic waste out of the landfill for a higher and better use at an organics management facility (composting facility or an anaerobic digester).

Organic materials degrading anaerobically (i.e., in a landfill) generate methane, a potent greenhouse gas. Landfills in Washington are required to have a methane capture system, however alternative management at an organics processing facility is still calculated as better for emissions reduction (Anglou et al., 2024). EPA's Waste Reduction Model (WARM, version 16) considers the methane capture at landfills and the additional transportation emissions from collection and hauling. Reaching Washington's goal of reducing organics in the landfill could reduce over 450 metric tons of CO_2 equivalent (EPA, 2023).

Organics management facilities are regulated by local health jurisdictions and Regional Air Agencies. Permits set capacity limits for incoming feedstock with consideration to odor and emissions. These local agencies respond to complaints and work with the facility to reduce odors on an individual level. Facilities have several techniques they can use to decrease odor and emissions including aeration, biofilters, wetting, and timing of turning.

To reduce emissions from transportation and hauling, local governments can use renewable diesel or electric vehicles. Investing in route optimization to reduce distances and making collection routes more efficient could also reduce emissions from collecting organic materials.

3. Water

Find help answering water questions[4]

a. Surface:
Find help answering surface water questions[5]

1. Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

[4] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water
[5] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water/Environmental-elements-Surface-water

Not applicable. The proposal is **not** project or site specific.

2. **Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.**

   Not applicable. The proposal is **not** project or site specific.

3. **Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.**

   Not applicable. The proposal is **not** project or site specific.

4. **Will the proposal require surface water withdrawals or diversions? Give a general description, purpose, and approximate quantities if known.**

   Not applicable. The proposal is **not** project or site specific.

5. **Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.**

   The proposal is **not** project or site specific. This project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

6. **Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.**

   The proposal is **not** project or site specific. This project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

   Each local area is unique in its geography. This includes special event locations, building sites, organics collection routes, and nearby waters. There is incidental and minimal risk for discharge of waste materials entering surface waters (ex. some material flies out of truck and lands in a body of water).

   Organics management facilities are required to control for runoff of leachate and any process water according to the local health jurisdiction rules and their permit requirements. These waters are not allowed to be discharged off site.

b. Ground:
Find help answering ground water questions[6]

[6] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water/Environmental-elements-Groundwater

1. **Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give a general description, purpose, and approximate quantities if known.**

   The proposal is **not** project or site specific. This project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

   Each local area is unique in its geography. This includes special event locations, building sites, organics collection routes, and nearby waters.

   Organics management facilities are required to control for runoff of leachate and any process water according to the local health jurisdiction rules and their permit requirements. These waters are not allowed to be discharged off site. The Solid Waste Handling Standards (chapter 173-350 WAC) address groundwater monitoring in section -500 and general application requirements in section -715.

2. **Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (domestic sewage; industrial, containing the following chemicals…; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.**

   Not applicable. The proposal is **not** project or site specific.

c. **Water Runoff (including stormwater):**

1. **Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.**

   Organics management facilities are required to control for runoff of leachate and any process water, including stormwater that falls on the site, according to the local health jurisdiction rules and their permit requirements. General permit requirements are in the Solid Waste Handling Standards (WAC 173-350-715). Any process waters are not allowed to be discharged off site. Most commonly facilities have tanks or lined ponds where water runs and is stored to either be treated or recycled through the facility's process (i.e., used in the process of making compost).

2. **Could waste materials enter ground or surface waters? If so, generally describe.**

   Organics management facilities are required to control for runoff of leachate and any process water, including stormwater that falls on the site, according to the local health jurisdiction rules and their permit requirements (WAC 173-350-715). These waters are not allowed to be discharged off site. Most commonly facilities have tanks or lined ponds where water runs and is stored to either be treated or recycled through the facility's process (i.e., used in the process of making compost).

3. **Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.**

   Not applicable. The proposal is **not** project or site specific.

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:

This project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

Organics management facilities are required to control for runoff of leachate and any process water, including stormwater that falls on the site, according to the local health jurisdiction rules and their permit requirements (WAC 173-350-715). These waters are not allowed to be discharged off site. Most commonly facilities have tanks or lined ponds where water runs and is stored to either be treated or recycled through the facility's process (i.e., used in the process of making compost).

Ground, surface, and runoff waters may be impacted by the application of compost. The state requires compost that is taken off-site or sold to the public to be tested according to WAC 173-350-220, Table 220-B. The Solid Waste Handling Standards also require compost facilities to meet Process for Reducing Pathogens (PFRP) to kill plant and animal pathogens.

4. Plants

Find help answering plants questions

a. Check the types of vegetation found on the site:

☐ **deciduous tree: alder, maple, aspen, other**

☐ **evergreen tree: fir, cedar, pine, other**

☐ **shrubs**

☐ **grass**

☐ **pasture**

☐ **crop or grain**

☐ **orchards, vineyards, or other permanent crops.**

☐ **wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other**

☐ **water plants: water lily, eelgrass, milfoil, other**

☐ **other types of vegetation**

b. What kind and amount of vegetation will be removed or altered?

The proposal is **not** project or site specific. This project does not propose new facilities or development. New facilities and development would be subject to the relevant local and

state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

Each local area is unique in its geography. This would include special event locations, building sites, organics collection routes, and nearby vegetation.

c. List threatened and endangered species known to be on or near the site.

The proposal is **not** project or site specific. This project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

Each local area is unique in its geography. This would include special event locations, organics collection routes, and nearby vegetation.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any.

Not applicable. The proposal is **not** project or site specific.

e. List all noxious weeds and invasive species known to be on or near the site.

The proposal is **not** project or site specific. This project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

Each local area is unique in its geography. This would include special event locations, organics collection routes, and nearby vegetation.

Some plants may not be suitable for composting or accepted at an organics management facility. Common examples include leaves and stems from cannabis and tropical plants, invasive weeds, and potentially contaminated materials such as cattails removed from a roadside (which bioaccumulate toxins like 6PPD). Organics management facilities have a right to determine what materials they accept, within the scope of their permit. They also have the right to reject loads that may jeopardize the quality of their final product. Contaminated materials are excluded from the definition of “Organic materials” in the model ordinances and the Solid Waste Handling Standards (WAC 173-350). Service providers and local governments do customer outreach about accepted materials and invasive weeds often in conjunction with the local Noxious Weed Board. These are also excluded from the definition of “Organic materials.”

5. Animals

Find help answering animal questions[7]

[7] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-5-Animals

a. List any birds and other animals that have been observed on or near the site or are known to be on or near the site.

The proposal is **not** project or site specific. The project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

Each local area is unique in its geography. This includes special event locations, building sites, organics collection routes, and nearby fauna.

b. List any threatened and endangered species known to be on or near the site.

The proposal is **not** project or site specific. The project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

Each local area is unique in its geography. This includes special event locations, building sites, organics collection routes, and nearby fauna.

c. Is the site part of a migration route? If so, explain.

The proposal is **not** project or site specific. The project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

Each local area is unique in its geography. This includes special event locations, building sites, organics collection routes, and nearby fauna.

d. Proposed measures to preserve or enhance wildlife, if any.

The proposal is **not** project or site specific. The project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

e. List any invasive animal species known to be on or near the site.

The proposal is **not** project or site specific. The project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

Each local area is unique in its geography. This includes special event locations, building sites, organics collection routes, and nearby fauna. Organics management facilities will be seeing larger amounts of food waste, which can attract animals and vectors. A facility's permit and operating plan contain vector reduction and monitoring practices (WAC 173-350-320(6)(B)).

6. Energy and natural resources

Find help answering energy and natural resource questions[8]

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

Not applicable. The proposal is **not** project or site specific.

b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

There is no foreseeable threat to using solar at adjacent properties or sites.

The proposal is **not** project or site specific. The project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any.

According to EPA (2023), preventing food and organic waste is the best option from a greenhouse gas emissions perspective. Preventing food waste can happen through reduction or donation to a hunger relief organization. Composting organic waste is the next preferred option according to the EPA's Wasted Food Scale and their Waste Reduction Model (WARM, version 16), a comprehensive calculator tool for comparing waste management scenarios. Composting organic waste instead of landfilling often leads to negative greenhouse gas emissions, or carbon credits.

Compost is a valuable commodity with many uses including erosion control, biofiltration, horticultural, and others. When land applied, carbon is returned to the land. In agricultural settings, this helps farmers use fewer chemical fertilizers. The Washington State Department of Agriculture has a compost reimbursement program for qualifying farmers to help build market demand as compost facilities create more supply.

7. Environmental health

Health Find help with answering environmental health questions[9]

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur because of this proposal? If so, describe.

The proposal is **not** project or site specific. The project does not propose new facilities or development. New facilities and development would be subject to the relevant local

[8] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-6-Energy-natural-resou
[9] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-7-Environmental-health

and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

There are inherent risks involved with all the model ordinance topics, and permits should include emergency plans. Little additional risk is added by adopting the model ordinances.

With organic management facilities processing more material and making more finished compost, they need a viable market and a value for their product for it to fall outside the definition of "Solid waste" and become a saleable commodity (WAC 173-350-021). Piles of finished compost and feedstocks can pose fire risks especially large piles and during period of hot and dry weather. In some cases, hazardous waste requirements can kick in if piles are certain volumes or sit for too long.

1. **Describe any known or possible contamination at the site from present or past uses.**

   The proposal is **not** project or site specific. The project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

   There are inherent risks involved with all the model ordinance topics, and permits should include emergency plans.

   Contamination at compost facilities is expected to increase as service providers add more customers and food waste becomes a required material to accept. Food waste often brings more contaminants. In Washington State, the most common contaminants at compost facilities include film plastic, plastic, dog toys, glass, metal and garbage (Cascadia Consulting Group, 2024).

   In addition to plastics, persistent agricultural pesticides (e.g., chlorpyrifos) and toxins from dredged material have been identified as contaminants that concern organic management facilities.

2. **Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.**

   Not applicable to this project. The proposal is **not** project or site specific. The project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

3. **Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.**

Not applicable to this project. The proposal is **not** project or site specific. The project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

There are inherent risks involved with all the model ordinance topics, and permits should include emergency plans.

4. Describe special emergency services that might be required.

Compost is not considered a solid waste in Washington (WAC 173-350-021) if made according to local and state regulations; it is a valuable commodity.

Any transporter of organic waste and a facility that manages organic waste must have an approved emergency plan that outlines prevention and responses to hazards like fires, floods, and spills. This plan is reviewed and approved by the local health jurisdiction. For spills, the Department of Ecology must be contacted within 24 hours. If a facility is comfortable and equipped to douse small fires with their equipment, they may choose to self-manage. Otherwise, the local fire department is called.

5. Proposed measures to reduce or control environmental health hazards, if any.

The proposal is **not** project or site specific. The project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

There are inherent risks involved with all the model ordinance topics, and permits should include emergency plans.

The model ordinance for special events requires event organizers to take a training about waste management and preventing environmental impacts.

To address physical and chemical contamination from incoming feedstocks at organics management facilities, Ecology opened WAC 173-350 and its associated organics sections in December 2024. Over the next 2 years, Ecology will be re-writing and adding to these rules in response to the public process. This rulemaking also plans to address pre-processing technologies such as de-packaging facilities. The concern about contamination, including microplastics, is the potential impact of land applying finished compost that contains these pollutants. State rules and laboratory tests do not currently require (or even make possible) testing finished compost for emerging concerns like PFAS, 6PPD, and microplastics.

Currently, persistent agricultural pesticides are prohibited from being accepted at organics management facilities, and organic management facilities still exert autonomy over their choice of accepted feedstocks and decisions to reject incoming loads.

The State also has collective efforts to support demand for the compost market, including WSDA's compost reimbursement program and the compost procurement ordinances for local governments.

b. Noise

1. What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

The proposal is **not** project or site specific. The project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

Special events in general will produce noise from entertainment, vendors, guests, etc. as well as increased traffic.

Organic processing facilities also contribute noise from equipment, workers, and incoming loads from haulers.

2. What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site)?

Noise would increase from the mandatory collection of organic materials. Residents and businesses will hear a collection truck more often, but likely for short durations as it moves along its collection route. On some collection routes, this could add noise where there was none previously.

With increased volumes of feedstock and possibly customers, noise may increase around organics management facilities or their sales locations. Equipment may run longer or at different times. Increased noise would happen during regular business hours.

3. Proposed measures to reduce or control noise impacts, if any:

The proposal is **not** project or site specific. Mitigating noise during early morning routes or in ordinarily quiet areas would be up to the hauler and local government. Local health jurisdictions can also respond to noise complaints about facilities and work with the facility and complainant to reach a solution.

8. Land and shoreline use

Find help answering land and shoreline use questions[10]

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

[10] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-8-Land-shoreline-use

The proposal is **not** project or site specific. The project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses because of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

Not applicable to this project. The proposal is **not** project or site specific.

1. **Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how?**

   Not applicable to this project. The proposal is **not** project or site specific.

c. Describe any structures on the site.

Not applicable to this project. The proposal is **not** project or site specific.

d. Will any structures be demolished? If so, what?

Not applicable to this project. The proposal is **not** project or site specific.

e. What is the current zoning classification of the site?

Not applicable to this project. The proposal is **not** project or site specific.

f. What is the current comprehensive plan designation of the site?

Not applicable to this project. The proposal is **not** project or site specific.

g. If applicable, what is the current shoreline master program designation of the site?

Not applicable to this project. The proposal is **not** project or site specific.

h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

The proposal is **not** project or site specific. The project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

i. Approximately how many people would reside or work in the completed project?

The proposal is **not** project or site specific. The project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

j. Approximately how many people would the completed project displace?

The proposal is **not** project or site specific. The project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

k. Proposed measures to avoid or reduce displacement impacts, if any.

The proposal is **not** project or site specific. The project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any.

The proposal is **not** project or site specific. The project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:

Applying compost to agricultural and forest lands improves soil qualities and properties by improving soil fertility, supporting microbial life, reducing erosion and soil compaction, improving water holding capacity, suppressing plant disease and pests, encouraging plant growth, and reducing expenses associated with other inputs like fertilizers and pesticides.

9. Housing

Find help answering housing questions[11]

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

Not applicable to this project. The proposal is **not** project or site specific.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

Not applicable to this project. The proposal is **not** project or site specific.

c. Proposed measures to reduce or control housing impacts, if any:

Not applicable to this project. The proposal is **not** project or site specific.

[11] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-9-Housing

10. Aesthetics

Find help answering aesthetics questions[12]

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

Not applicable to this project. The proposal is **not** project or site specific.

b. What views in the immediate vicinity would be altered or obstructed?

Not applicable to this project. The proposal is **not** project or site specific.

c. Proposed measures to reduce or control aesthetic impacts, if any:

Not applicable to this project. The proposal is **not** project or site specific.

11. Light and glare

Find help answering light and glare questions[13]

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

The proposal is **not** project or site specific. The project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

Passing trucks on their collection routes could produce additional glare for other drivers and pedestrians, however, it would be short-lived.

b. Could light or glare from the finished project be a safety hazard or interfere with views?

The project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

Any glare from a passing truck would be in passing except special circumstances.

c. What existing off-site sources of light or glare may affect your proposal?

The proposal is **not** project or site specific. The project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

d. Proposed measures to reduce or control light and glare impacts, if any:

[12] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-10-Aesthetics
[13] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-11-Light-glare

The proposal is **not** project or site specific. The project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

12. Recreation

Find help answering recreation questions

a. What designated and informal recreational opportunities are in the immediate vicinity?

Not applicable to this project. The proposal is **not** project or site specific.

b. Would the proposed project displace any existing recreational uses? If so, describe.

Not applicable to this project. The proposal is **not** project or site specific.

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

Not applicable to this project. The proposal is **not** project or site specific.

13. Historic and cultural preservation

Find help answering historic and cultural preservation questions[14]

a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe.

Since the model ordinance topics deal with infrastructure and facilities that exist, nearby preservation sites should not be an issue. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.

Since the model ordinance topics deal with infrastructure and facilities that exist, nearby historic use should not be an issue. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

[14] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-13-Historic-cultural-p

c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.

Since the model ordinance topics deal with infrastructure and facilities that exist, encountering cultural and historical resources is unlikely. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

Since the model ordinance topics deal with infrastructure and facilities that exist, encountering cultural and historical resources is unlikely. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

14. Transportation

Find help with answering transportation questions[15]

a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.

The proposal is **not** project or site specific. The project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

Not applicable to this project. The proposal is **not** project or site specific.

c. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle, or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).

The proposal is **not** project or site specific. The project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

[15] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-14-Transportation

The mandatory collection model ordinance has waiver options to mitigate the impact at sites and on streets that are not set-up for organics collection. For example, there are "available space waivers", "financial hardship waivers", and on-site organics management waivers.

d. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

The proposal is **not** project or site specific. The project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

e. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?

The proposal is **not** project or site specific. The project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

Ecology used the EPA's Waste Reduction Model (WARM, version 16) to assess the tradeoff between increased transportation emissions and emissions saved from diverting organic materials out of the landfill. Several different scenarios were run in the model, including a "worst case option." The exact number of trips per day was not provided by WARM's output, and the number will vary depending on the location. Most of the increased vehicular traffic would be commercial hauling trucks picking up material from customers and transporting it to an organics management facility.

An "average" scenario used 20 miles to the nearest compost/organics management facility. The model is built on the typical amount of organic waste hauled in a single collection truck. It looks at the number of tons intended to be composted in the alternative scenario versus landfilled in the baseline scenario and calculates the number of trips as part of its analysis for greenhouse gas emissions. Reaching Washington's goal of reducing organics in the landfill could reduce over 450 metric tons of CO_2 equivalent (EPA, 2023), even with increased transportation emissions.

f. Will the proposal interfere with, affect, or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

The proposal is **not** project or site specific. The project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances. Organics management facilities may be a destination for agricultural or forest products that

are not suitable for sale, but still suitable for composting or other organic materials management.

g. Proposed measures to reduce or control transportation impacts, if any:

The proposal is **not** project or site specific. Haulers are incentivized to reduce the number of trips as it improves operational efficiency, and local governments may impose other requirements in their service contracts with haulers.

15. Public services

Find help answering public service questions[16]

a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.

The proposal is **not** project or site specific. If facilities are following their operating plans and permits, no additional needs for public services should come from the model ordinances. As previously discussed, organics management facilities have inherent risks such as fires. Risks can increase with larger piles, and hotter, drier weather. Facilities should follow best management practices and their plans to both monitor for hazards and respond appropriately.

b. Proposed measures to reduce or control direct impacts on public services, if any.

Local and state permit requirements require an emergency plan for facilities. Incidents at facilities usually trigger a visit from the local health jurisdiction and/or Ecology's regional Facilities Specialist, which is an opportunity to confirm is a facility is following their preventative practices and operating plan.

16. Utilities

Find help answering utilities questions[17]

a. Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other:

Not applicable. The proposal is **not** project or site specific.

b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

The proposal is **not** project or site specific. The proposal is **not** project or site specific. The project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level

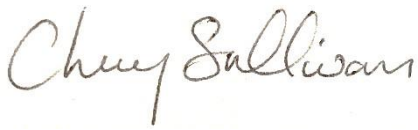
[16] https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-15-public-services
[17] https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-16-utilities

SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

Signature

Find help about who should sign[18]

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.



Type name of signee: Chery Sullivan

Position and agency/organization: Policy Section Manager, Solid Waste Management Program; Department of Ecology

Date submitted: December 16, 2024

Supplemental sheet for nonproject actions

Find help for the nonproject actions worksheet[19]

Do not use this section for project actions.

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. **How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?**

   This nonproject action would increase emissions associated with collecting organic materials and transporting them to an organics management facility. Noise from more collection trucks and existing facility operations may increase for residents and businesses. Processing organic waste into compost or digestate can produce its own emissions and hazardous substances like leachate. These facilities are regulated by Regional Air Agencies

[18] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-C-Signature
[19] https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-d-non-project-actions

as well as local health jurisdictions, who inspect facilities to make sure they are following their operations plan.

- **Proposed measures to avoid or reduce such increases are:**

Facilities operate under air and solid waste permits that are overseen by Air Agencies and local health jurisdictions. Facilities must abide by all the plans in their permit to protect the environment and public health. Noise increases would be minimal and short-lived for residents and businesses that are not located near an organics processing facility.

The EPA's Waste Reduction Model (WARM, version 16) shows an overall decrease in greenhouse gas emissions when organic materials are composted instead of landfills. This considers emissions from transportation, processing, and methane capture systems at landfills.

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

This nonproject action is unlikely to have its own impacts on plants, animals, fish, and other marine life. The proposal is **not** project or site specific. The project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

On the contrary, the use of compost has shown it has many uses and benefits including improving soil properties and plant health.

- **Proposed measures to protect or conserve plants, animals, fish, or marine life are:**

The Solid Waste Handling general permit and site-specific permits granted by local health jurisdictions have prevention and mitigation efforts to minimize any potential impact on nearby plants, animals, marine life, and water.

There is growing concern about emerging issues at organics management facilities around contamination from (micro)plastics, persistent pesticides, and chemicals such as PFAS, 6PPD, and others. It is unclear to what extent these contaminants are present in compost or at compost facilities. Land applying compost that is contaminated may cause environmental harms. Ecology opened the organics sections of the Solid Waste Handling Standards (WAC 173-350) to have ongoing conversations with stakeholders and incorporate new aspects into rule around contamination and load rejection.

3. How would the proposal be likely to deplete energy or natural resources?

The model ordinances are not expected to deplete energy or natural resources. In fact, composting organic waste compared to landfilling often results in negative greenhouse gas emissions, or carbon credits. When land applied, carbon is sequestered in soil and eventually plants and animals.

- **Proposed measures to protect or conserve energy and natural resources are:**

Applying compost can replace chemical fertilizers and reduce the need for other petroleum-based inputs. The state was efforts in multiple agencies to create demand for compost and

using it for public and private projects. These include the Washington State Department of Agriculture's compost reimbursement program and local compost procurement ordinances.

4. **How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection, such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?**

By itself, this nonproject action is not likely to impact environmentally sensitive or protected areas since it uses existing infrastructure and facilities. The proposal is **not** project or site specific. The project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

- **Proposed measures to protect such resources or to avoid or reduce impacts are:**

Applying compost is not appropriate for all lands and may be restricted by law. This is the case for wetlands and National Parks. Agricultural lands are typically prime places for compost application.

5. **How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?**

This nonproject action is unlikely to have its own impacts on shoreline use or conflict with existing plans. The proposal is **not** project or site specific. The project does not propose new facilities or development. New facilities and development would be subject to the relevant local and state permit approvals as well as project-level SEPA review for the specific proposal and its planned activities, especially for the special event and building design model ordinances.

- **Proposed measures to avoid or reduce shoreline and land use impacts are:**

Compatibility with shoreline use and existing plans should be assessed during a facility's initial permit. Local and state general permits and Solid Waste Handling Standards have preventative and mitigation efforts to protect shorelines. Compost applications are not overseen or reported to Ecology (or any government agency unless part of a reimbursement program). Project managers must do due diligence before applying compost to private lands and checking with owners of public lands to make sure it is allowed.

6. **How would the proposal be likely to increase demands on transportation or public services and utilities?**

The proposal is **not** project or site specific. This nonproject action (and the state's Organics Management Law) seek to expand public utilities for organic waste collection and management, so this material is taken to a processing facility rather than the landfill. Demand will increase for solid waste collection services.

- **Proposed measures to reduce or respond to such demand(s) are:**

Local governments are amending and adopting local plans to account for the increased demand and requirements for organics management service. Each jurisdiction's situation is unique. Ecology is facilitating conversations and supporting local planning through organic summits, plan reviews, and attending local Solid Waste Advisory Committee meetings.

While RCW 70A.207.030 allows local governments to use this SEPA review instead of a local one (if adopting the model ordinance language), they still must go through any required administrative processes to pass an ordinance. This would include gathering information on costs, available service, capacity, and impacts to services that is shared with the local Council or Board. Community participation is usually key in these processes too.

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

There have not been any identified laws that conflict with this non-project act. The model ordinances are designed to support local governments comply with state laws, specifically RCW 70A.205.540 and .545. Local governments will be drafting and passing their ordinances individually with consideration for any other local laws or rules that may impact the language.

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