



People's Memorial
A s s o c i a t i o n
Funeral Advocacy & Education since 1939

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September 17, 2025

People's Memorial Association calls on the Department of Ecology to reexamine its policy of limiting crematory capacity by machine age in light of the looming cremation crisis.

Dear Puget Sound Clean Air Agency,

The Department of Ecology and the Clean Air Agencies of Washington's counties are inadvertently contributing to a rising crisis within our funeral industry. Crematories are a part of the vital public health infrastructure. 79% of Washingtonians chose cremation as their desired disposition method in 2024. The increasing population of Washington State results in an increase in deaths per year. Yet the way the Department of Ecology has regulated Washington crematoriums is at odds with the public's needs.

The funeral industry is facing a growing supply and demand problem as annual deaths increase, rising 9.7% in 2024 according to the Seattle Times, causing funeral homes and their subcontractors to serve more families each year. At the heart of this capacity issue are retorts, the machines that perform cremations. Retorts are tightly regulated for emissions by the Environmental Protection Act and the county-level Clean Air Agencies.

The total number of cremations completed each year is determined by the number of retorts available and also artificial limits imposed by Clean Air Agencies at the request of the Department of Ecology. People's Memorial Association suggests that the current system of limits are misaligned because they excessively restrict operation of newer retorts while many older retorts operate under less stringent emissions standards than modern equipment because they were grandfathered in when the Clean Air Act was signed into law.

Modern retorts have lower emissions than older retorts and yet are limited more strongly, keeping more polluting retorts online for longer. We simply must ask: Is that right? Unfortunately our state relies on these older machines as they do carry a major portion of the burden of helping us mourn our dead, and it is our duty to take care of and steward these machines wisely. Current limitations placed on newer machines dissuade crematory operators from installing new machines and risking new, stricter limitations by



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the Department of Ecology. It makes good sense to find a way to shift our reliance away from older retorts to modern, more ecologically friendly retorts.

We at People's Memorial Association stand by the Clean Air Act and support limitations on emissions by polluting retorts. However, we must face the fact cremations are a vital part of our collective funeral industry and the public health continuum. The current system of limitations on burning are running contrary to the needs of the public and the environmental conservation they strive to protect. The Department of Ecology must reexamine their policies around which retorts should be limited and by how much with special attention paid to the emissions differences between older and newer machines.

Casey Husseman Brandt
Executive Director

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Board President

Dennis Barnes
Board Member, Chair of Legislative Committee