

RESPONSIVENESS REPORT

Regional Solid Waste Management Plan Update: Final Phase of Public Involvement

In the summer of 2007, Metro conducted a final public comment period on the updated Regional Solid Waste Management Plan (RSWMP). RSWMP incorporated the Interim Waste Reduction Plan, which received extensive public comment before being approved by the Oregon Department of Environmental Quality and the Metro Council in 2006.

Opportunities to comment on the complete RSWMP were publicized through emails to an interested parties list, and through advertisements placed in The Oregonian and in all of the newspapers within the Community Newspaper network. In addition, the public comment opportunity was noticed on Metro's website, and in several Metro Councilor newsletters.

Summary of public comment

During this final phase of public and stakeholder involvement, a total of 22 people commented on the Plan. Many comments supported a variety of changes to the Portland collection system rather than dealing specifically with RSWMP contents. Comments relevant to the Plan did not require significant Plan changes.

Comments included:

- a desire to have more materials added to curbside recycling, especially plastics
- concerns about excessive and non-recyclable packaging
- support for changes to the curbside collection system
- suggestions that the plan include other numeric goals beyond the 2009 waste reduction goal of 64%
- questions about Plan enforcement
- suggestions that the Plan's sustainability focus be strengthened
- support for the Plan's direction and focus on sustainability
- recognition of the Plan's importance in meeting state goals and statutes

Staff response

Metro staff reviewed all comments. Responses to those comments directly relevant to the Plan are contained in this report. This responsiveness report and a link to the final draft of RSWMP were posted on Metro's website.

Council adoption

The Metro Council is expected to consider the RSWMP for adoption in the fall of 2007. A public hearing will be held at that time, providing the final opportunity for public comment on the Plan.

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Public comment on the draft RSWMP update

What we heard	How we responded
Plan Vision, Goals and Policies	
Why is the Plan so focused on a short-term goal of 64 percent waste reduction by 2009?	The 64 percent goal is a benchmark adopted in state law. RSWMP is, in large measure, designed to help achieve this goal. The Plan anticipates that the goal will not be achieved by 2009, largely due to shortfalls in commercial sector material recovery.
It should be made clear that the Plan's waste reduction goal only gets us to 2009. Need to establish a longer-term goal, with activities and benchmarks.	As detailed in chapter 5, amendments will be proposed for the RSWMP within the next two years to incorporate new benchmark material recovery goals. Other measures of performance in resource conservation may be proposed as well.
The Plan should step back and talk about why sustainability is important.	The Plan assumes readers have a basic understanding of sustainability. To further that understanding, however, the Plan defines sustainability ("using, developing and protecting resources in a manner that enables people to meet current needs and provides that future generations can also meet future needs . . ."). The importance of sustainability is illustrated through the Plan's focus on resource conservation and pollution prevention (chapter 4) and system operations (chapter 5).
Put the 12 policies, 13 goals and 68 objectives in one place, maybe an appendix.	The final Plan will include a table in the appendix that lists the policies, goals and objectives.
A sustainable practice should be viewed as an opportunity that one should be encouraged to evaluate, not as just an alternative to consider.	Policy 3.0 will be revised in response to this comment as follows. 3.0 <u>Evaluating Opportunities for Sustainability</u> - alternatives evaluation <u>Opportunities for increasing the sustainability of alternatives identified for</u> business practices or programs will be evaluated based on: a) technological feasibility; b) economic comparison to current practice or conditions; and c) net environmental benefits.
Strengthen the vision by adding a statement that the region will work toward zero waste.	The vision as stated is generally agreed to by the Plan's diverse stakeholders. Zero waste is a concept valued by stakeholders who believe it can fundamentally reshape how we look at "waste;" other stakeholders consider zero waste an unattainable ideal. We believe both groups of stakeholders can agree that a real strength of the RSWMP vision lies in its commitment to working toward a sustainable future.
Even though cost is a driver in shared responsibility, it shouldn't be the only one. Resource conservation is an important concept to include in the shared responsibility value.	Resource conservation leads the Regional Values section of the Plan. The shared responsibility value is meant to reflect a desire to "share the load," e.g., shift at least some costs of end-of-life product management from ratepayers to manufacturers and retailers.
Quantity of waste generated should be a primary benchmark.	Metro will be working with the Oregon Department of Environmental Quality (DEQ) to identify additional strategies to reduce waste generation and measure progress. The DEQ recently completed a study that identified areas where waste generation was increasing (e.g., the building industry) and proposed preliminary strategies to address the increases.

Program Areas	
More materials should be recyclable and more recyclables should be collected curbside.	The Plan supports adding new materials as markets allow. Metro and the region's local governments continually monitor the markets for recyclable materials. Local governments add materials to curbside programs when markets are stable.
Multi-family education efforts need to include working relationships between, the residents, local government and recycling company.	The Plan provides direction for improving multi-family recycling efforts, including emphasis on tenant education and creating a uniform program throughout the region.
There should be more convenient disposal options for hazardous waste.	The collection opportunities that Metro provides are among the most convenient of any program nationally. Two permanent facilities are open six days a week, 9 a.m. to 4 p.m., year-round. In addition, Metro provides weekend collection events March through November.
More efforts should be made to reduce packaging. For example: a tax on non-recyclable packaging or requiring businesses to use more sustainable packaging;	Metro and the DEQ have developed resource materials to help businesses reduce packaging: http://www.deq.state.or.us/lq/sw/packaging/index.htm . These materials are supported through the Plan's business recycling programs. Packaging will also continue to be a focus of the strategic discussion on waste generation discussed earlier. Finally, packaging can be expected to be part of the discussions on priorities for product stewardship initiatives.
Product stewardship is a new section and the plans are quite general. Shouldn't the Plan anticipate more specificity in time?	Plans to implement the product stewardship objectives will be developed in more detail over time. The Plan commits to coordinating the development of these implementation plans through work groups and reports to SWAC and Metro Council.
Oregon should implement RoHS for electronics. (RoHS is the European Union's directive on reducing the use of toxic materials in electronic products).	Oregon's new e-waste recycling bill (HB2626) does not include a RoHS-type provision. Technical issues (e.g., which chemicals and products to cover), and concerns about each state passing different versions, make adopting such provisions at a state level difficult.
Are education efforts just ongoing, or will new tactics will be added?	Ongoing adult and school education programs are built on the concept of targeting specific audiences. New tactics will be added to ensure programs continue to effectively reach their target audiences.
What about more market development efforts for plastics, especially Styrofoam? Efforts could include grants or support through mentoring and networking.	Previous regional market development programs have offered grants and loans to developing enterprises. These programs were discontinued, as they proved ineffective at a regional level. Ongoing efforts to help plastic markets will include forums on standardizing materials collected curbside; the expanded bottle bill, which will make more valuable plastic material available; and listing credible material recycling enterprises on the Metro Recycling Hotline.
Sustainable Operations	
Will Metro refuse to approve a solid waste facility if it is not in compliance with LEED standards?	The sustainable operations objective 5.2 reads: " <i>Require</i> new solid waste facility construction to meet LEED or equivalent program standards." Metro Council will consider this objective in reviewing new facility applications in the future.

<p>Is Metro seeking new authority to implement some of these objectives regarding employee health and safety, training and quality work life?</p>	<p>No. Metro will work with its public and private sector partners to prioritize, implement, and report progress on achieving the Plan's sustainable operations objectives.</p>
<p>Reconsider the wording of several of goals in the Sustainable Operations chapter because, with verbs like "reduce" rather than "eliminate" they are "green" goals not "sustainability" goals.</p>	<p>Goal statements do call for reduction and mitigation of certain emissions and wastes, rather than complete elimination. The path to complete elimination of disposed waste, greenhouse gases, diesel particulate emissions, and stormwater run-off will be incremental. Making steady progress toward sustainable operations over the 10-year life of RSWMP is the intended result.</p>
<p>Other</p>	
<p>The Plan doesn't make clear what a private sector service providers' responsibilities are.</p>	<p>The responsibilities of private sector service providers under this Plan are identified in chapters 2 and 6, e.g., ". . . continue developing and expanding recycling and recovery services, as well as engaging in efforts to achieve sustainable operations."</p>
<p>The term "tri-county region" is used on occasion, rather than metro region. Why?</p>	<p>The "tri-county region" references the Clackamas, Multnomah and Washington counties watershed as identified in ORS 459 and 459A. The term "Metro region" is used when referring to the Metro boundary, which encompasses most, but not all, of the tri-county region.</p>
<p>In Appendix B on Regional Disaster Debris Management, it states "Over 100 recycling and composting companies operate in the region." There are far less identified in Appendix E.</p>	<p>The large number of facilities referred to in Appendix B include not just the licensed and franchised facilities in Appendix E, but also the more numerous companies that take only source separated materials (e.g., wood, metal, concrete) and are not regulated by Metro.</p>
<p>It's important that all local governments who regulate collection be informed of Plan impacts on their authority to design and administer their local programs.</p>	<p>Agreed. Metro informs local governments about the impacts of the Plan through various channels, including: monthly meetings of the area's solid waste directors; local government recycling coordinator meetings; and the Regional Solid Waste Advisory Committee. Local government staff who are involved in these groups also have a responsibility to communicate to their elected officials. Local governments in the region need to be aware of ORS 459.095, the state statute that requires ordinances, orders, regulations or contracts to be consistent with the RSWMP. The Plan's few limitations on local governments' "authority to design and administer their local programs" are meant to ensure that progress in residential recycling is maintained. However, the Plan is flexible. Local alternatives to the Plan's residential recycling service standard can be proposed. Metro reviews and approves these alternatives if they perform at the same or higher level than the regional service standard practice.</p>
<p>How will this document be enforced?</p>	<p>The Plan focuses on cooperation and coordination among stakeholders to achieve its goals and objectives, rather than describing specific mechanisms that could be used to enforce the Plan. Metro Code can be amended to include specific plan enforcement provisions as necessary.</p>