

# Public comment report



Attachment 2 to Staff Report for Ordinance No. 19-1435

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April 25, 2019

Prepared by: Hila Ritter  
503-797-1862

## BACKGROUND

COR Transfer Station, (partner company of City of Roses Disposal and Recycling) a Metro-licensed non-putrescible (dry) waste material recovery facility located at 4580 NE 138<sup>th</sup> Avenue in Portland, (Metro District 1), submitted a Solid Waste Facility Franchise application to Metro to operate a transfer station at its existing facility. In addition to its current material recovery facility (MRF) operation, COR Transfer Station seeks to accept putrescible (wet) waste for consolidation and transport to a landfill for disposal.

## PUBLIC NOTICE AND OPPORTUNITY TO COMMENT

Metro posted notice and provided an opportunity for the public to review and submit comments on COR Transfer Station's franchise application. The public notice was posted on Metro's website, mailed to approximately 1,420 property owners, schools, neighborhood association and residents surrounding the facility, and emailed to other parties that have a general interest in solid waste issues. The 30-day public comment period began on December 28, 2018, was extended an additional two-weeks to ensure sufficient time to comment, and closed February 8, 2019.

In addition to posting the application for public review and comment, staff also hosted a community conversation in conjunction with the Oregon Department of Environmental Quality's (DEQ) public hearing for the proposed transfer station at Shaver Elementary School on April 9. This event was planned in response to requests for a public meeting received during Metro's public comment period, and approximately 70 people attended. The questions and concerns discussed at the meeting were similar to those articulated to Metro during the written comment period.

Metro received an additional five written comments via e-mail after the comment period closed on February 8, which did not become an official part of the record. COR Transfer Station submitted responses to the comments that Metro received, which are included in full at the end of this report.

## SUMMARY OF WRITTEN PUBLIC COMMENTS ON APPLICATION

Metro received 48 comments during the public notice period from 45 individuals or organizations. Twenty-six of the comments supported the proposed franchise citing support for a local minority-owned business, and increased recycling infrastructure. Twenty comments opposed the proposed franchise primarily due to its location (proximity to residential housing, restaurants, and Costco). Two comments were neutral/indeterminable.

The concerns and benefits that were identified by the commenters can be summarized in five general categories: livability, facility location, traffic, economic impacts and environmental impacts.

## 1. LIVABILITY

- Concerns that garbage odors will be pervasive in the surrounding community.
- Concerns about increased noise, both from trucks entering/exiting the site and equipment noise negatively impacting the community.
- Concerns about increased pests, particularly rodents

### Metro response #1 – Livability:

Metro is tasked with planning, management, and oversight of the region's solid waste system. It has an obligation to the public to ensure that the waste intended for reuse, recycling and other purposes is handled properly and sent to appropriate markets, and that all other waste is safely managed and disposed. In carrying out its oversight responsibilities, Metro balances the need to manage waste in or near the region with the needs of the local communities that live and work near these facilities.

The proposed franchise requires the franchisee to operate the facility in a manner that controls and minimizes off-site odors. In addition it must manage all wet waste received inside of a building and subsequently remove wet waste from the site within 24 hours of receipt. It also requires the facility to install an odor control and neutralizing system subject to approval by DEQ and Metro prior to accepting wet waste.

The facility is located in an industrial sanctuary and is subject to compliance with local noise regulatory standards allowed in industrial zones. Metro primarily relies on the local jurisdiction, in this case city of Portland, to determine noise allowances. The proposed franchise requires the franchisee to operate the facility in a manner that controls and minimizes noise and to meet applicable local noise regulatory standards and land-use regulations

The proposed franchise requires the franchisee to operate the facility in a manner that is not conducive to the harborage of rodents, birds, insects, or other vectors or pests. It further requires implementation of vector control measures if vectors are present or detected.

Metro employs two full time solid waste facility inspectors who are trained in environmental compliance and tasked with monitoring the solid waste facilities authorized by Metro in and around the region. The inspectors generally perform seven or eight inspections of a facility annually. When greater attention at a facility is merited, Metro performs an increased amount of both announced and un-announced facility inspections and complaint investigations in neighboring areas surrounding the facility. Metro has conducted one inspection of the applicant's current site on NE 138<sup>th</sup> Avenue, and 44 inspections of the former location at NE 109<sup>th</sup> Avenue (from August 2011 - January 2019). COR Transfer Station is currently in compliance with Metro's requirements and has a good history of compliance. In addition, DEQ and

city of Portland staff have reported that there are no enforcement or compliance issues associated with the current site.

## 2. FACILITY LOCATION

- Land use concerns, particularly, that a garbage facility should not be allowed in proximity to residential housing and restaurants.
- Concerns about whether there is a need for another transfer station in the region.
- East Portland has been historically disproportionately burdened by industry.

### Metro response #2 – Facility location:

This facility is located in a regionally-significant industrial sanctuary and has been the site of several industrial, commercial, and waste-related businesses since 1959. City of Portland has granted conditional use approval for the proposed waste-related activity in this industrial zone. Additionally, the site was formerly occupied by Oregon Recycling Systems which operated a material recovery facility there from 1995-2016. Additionally, the city of Portland had previously granted a conditional waste related use of the site and Metro had previously issued a transfer station franchise to the former occupant in 2005, although the transfer station never opened. The site has undergone significant site improvements under COR Transfer Station's ownership.

Metro is committed to working with existing facilities to ensure they operate in a manner that is benefitting the community, and overseeing the region's solid waste system to achieve public benefits of the highest and best use of materials and, when needed, their safe disposal. Since early 2017, Metro has been working with communities across the region to develop the 2030 Regional Waste Plan as both a vision for greater Portland's garbage and recycling system and a blueprint for achieving that vision. For more information visit: [www.oregonmetro.gov/regionalwasteplan](http://www.oregonmetro.gov/regionalwasteplan)

COR Transfer Station is a private business that has applied to Metro to operate at its location on NE 138<sup>th</sup> Ave. Although there are other transfer stations in proximity to this proposed facility (GSS Transfer locally owned by Gresham Sanitary Service and Troutdale Transfer Station owned by Waste Management), COR Transfer Station chose this site for its industrial zoning between three freight heavy streets and its historical use as a solid waste facility.

In order to help mitigate potential impacts from solid waste facilities on host communities, Metro requires that any facility receiving wet waste must collect and remit to Metro \$1 per ton for use in local community enhancement programs to mitigate facility impacts by improving economic opportunities, neighborhood livability, and public safety. As previously mentioned, COR Transfer Station is already operating as a dry waste material recovery facility at this location. Approval of a franchise will initiate the formation of a Community Enhancement Committee to grant funds for enhancement projects. Staff finds that the proposed franchise is not likely to adversely affect the surrounding community in an unreasonable manner.

### 3. TRAFFIC

- Concerns about increased traffic congestion.
- Railroad concerns and hazards associated with trains transporting oil.

#### Metro response #3 – Traffic:

Traffic is a major concern across the region. As greater Portland grows into a major metropolitan area, our communities need a collaborative approach to transportation planning, funding and implementation. Metro primarily relies on the local jurisdiction, in this case city of Portland, to determine traffic allowances for solid waste facilities. The applicant completed and submitted a Transportation Impact Study (TIS) to the City. Based upon the information that Metro received from City staff, the proposed activities comply with the Portland Bureau of Transportation and Oregon Department of Transportation traffic requirements. The vehicles that will access the site will likely use streets that are classified to accommodate truck movements. The applicant intends to direct customers to use NE Airport Way, when possible, to minimize congestion at the intersection of NE 138<sup>th</sup> Avenue and Sandy Boulevard. Finally, given the significant paving of the site, there will be adequate areas on site to accommodate the peak number of vehicles expected at the site at any one time.

The concerns about the adjacent rail line and potential impact of oil trains raised at the public meeting on April 9 are outside the scope of Metro’s franchise requirements. However, the franchise requires that the operator must comply with all local, state, and federal requirements. In addition, Union Pacific Railroad offers a railroad safety presentation for those interested in enhancing railroad safety in their community. Union Pacific inspects crossing signals regularly for a variety of safety checks. If a malfunctioning signal is noted, the public should report it via the Union Pacific Grade Crossing Hot Line (1-800-848-8715).

### 4. ECONOMIC IMPACTS

- Concern about decreased property values
- Increased job opportunities

#### Metro response #4 – Economic impacts:

The city of Portland has determined that the proposed waste-related use is appropriate for this industrial site. At this time, Metro does not regulate the location where private facilities are cited, and relies on the local jurisdiction for zoning determinations.

Regionally significant industrial areas are near major transportation routes that enable efficient movement of freight, and movement and storage of goods. These are vital to the region’s economy and provide good jobs. COR Transfer Station proactively hires second-chance populations and provides living wage jobs to this marginalized group as well as employing people of color. As mentioned previously, this is a locally-owned business whose owners live in the community where the facility is located and seeks to support the local community and economy. COR Transfer Station expects that diversifying and expanding its operations will increase its ability to create more living wage jobs.

## 5. ENVIRONMENTAL IMPACTS

- Concerns about potential contamination of air from dust and odors, and groundwater or nearby waterways such as the Columbia Slough due to contaminated stormwater.
- Comments in support based on COR Transfer Station’s sustainable business practices and innovation in the recycling industry.

### Metro response #5 – Environmental impacts:

The proposed site has undergone significant site improvements since COR Transfer Station acquired ownership of the facility in 2018. For example, all site roadways have been paved to mitigate dust from vehicle traffic, significant portions of exterior siding of the main building were replaced to decrease exposure to elements and increase aesthetics, land clearing and preliminary landscaping have begun to enhance visual aesthetics and buffer site activities, and the site office building has been largely renovated. As a condition of sale of the property to COR Transfer Station, an engineered bio-swale and natural area was installed on the eastern property line to control site drainage and function as a buffer. City of Portland’s Bureau of Environmental Services has evaluated the existing stormwater management system and has determined that it meets the City’s requirements. The site has also applied for and obtained a DEQ National Pollutant Discharge Elimination System Stormwater Discharge Permit 1200-Z. In addition, the proposed Metro franchise requires additional facility infrastructure improvements for the capture and management of leachate (liquid that has come into direct contact with solid waste and contains dissolved, miscible and/or suspended contaminants as a result of such contact) subject to approval by DEQ and Metro prior to the acceptance of wet waste. This requirement is to ensure that the catchment and storage system located inside the facility is sufficient to manage any liquids that are then regularly pumped out and transported offsite to a wastewater treatment facility. Additional site infrastructure improvements are planned, as described above, including construction improvements to buildings, and paving and site improvements including design, engineering and permitting for site drainage and traffic access.

COR Transfer Station is actively working toward increasing its recovery rate of recyclable materials, particularly around re-use of reclaimed lumber and discarded wood products. The proposed transfer stations may reduce emissions in the region based on decreased vehicle miles traveled while also increasing workforce and enterprise opportunities for low-income people and people of color. As mentioned previously, COR Transfer Station’s hiring practices are intentional around building wealth in low-income and people of color communities who have been marginalized in the region’s economic prosperity. Additionally, COR Transfer Station is a certified Benefit Corporation, which are businesses that achieve a minimum verified score on a rigorous assessment of a company’s impact on its workers, customers, community, and environment—and make their Benefit Impact Report transparent on [bcorporation.net](http://bcorporation.net). Certified Benefit Corporations also amend their legal governing documents to require their board of directors to balance profit and purpose.

Staff finds that the proposed facility supports many of the goals of the Regional Waste Plan that was collaboratively created with the community to plan for the future of the solid waste system with a focus

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Portland, OR 97232-2736

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on equity, health and the Environment. This proposed franchise will increase the percentage of garbage and recycling system revenue that benefits a company owned by people of color (Goal 2), increase the diversity of the workforce in occupations where people of color are underrepresented (Goal 4), promote efficient off-route travel which reduces environmental impacts (Goal 12), support investment in the host community by way of the Community Enhancement Grant program (Goal 13), and implement the transfer system configuration policy by including a small, locally-based business in the region's solid waste system (Goal 16).

**PUBLIC COMMENTS ARE LISTED BELOW IN NO PARTICULAR ORDER:**

1. I am sending this email to show my support for the transfer station franchise proposal being submitted by City of Roses Disposal & Recycling! When opportunities like these are offered to organizations of color it shows the community that Portland has and supports the economic growth and development for minority owned business. Additionally, this company conducts sustainable and environmentally friendly practices. Also, they are leaders in innovative recycling practices. Lastly, as an individual who is a native to Portland and impacted by gentrification in inner N/NE Portland, it's important to me to see equal access to space for minority owned businesses.
2. This letter is in support of the transfer station franchise proposal being submitted by City of Roses Disposal and Recycling. City of Roses is a local minority-owned business focused on sustainability and innovation. Their increased industry presence will be a benefit to diversifying the disposal industry and investment in the local community.
3. I am writing in support of the transfer station franchise proposal being submitted by City of Roses Disposal & Recycling. Alando Simpson came to the Parkrose Neighborhood Association a couple years ago when he was thinking of expanding his current facility in the neighborhood., and at the time, it appeared he had all the bases covered. From what I have seen of his plans for the Argay station, he has continued to follow all the necessary precautions against noise and vectors and has even taken traffic impacts into account. There are other reasons I support this project. Simpson has sustainability at the core of his business. Recycling is a bigger interest of his, but he is creating a transfer station in our area both because he sees a need as this area's population grows and also to have shorter trips for garbage trucks to make on the east side, thereby reducing fuel usage. His business will also be a minority-owned business that will create jobs (in an area that typically has higher unemployment than the rest of Portland) and will keep profits local. Overall, Simpson and his family--who has been in this community since the early 1900s--has community concerns in mind, and I trust his business will be beneficial. I'm glad he has chosen to invest in our community, and I'm looking forward to see how the Community Enhancement Grant program that comes along with a transfer station project can help improve an area that suffers from blight and is the home to vulnerable populations. Thank you for considering my commentary, and I hope that Mr. Simpson's project will be approved.
4. I am writing you this email to show my support for the transfer station franchise proposal being submitted by City of Roses Disposal & Recycling. I hope that you recommend or vote for approval of this proposal.  
City of Roses Disposal and Recycling is African American owned waste hauling and recycling benefit company with deep roots and long standing ties to the North and Northeast

Portland community. It is the first African American transfer station in the state of Oregon. As long time African American resident of Northeast Portland, myself, this business is great for Portland and supports the equity goals that have been expressed by the City of Portland and METRO.

City of Roses is a leader and innovator. This business focuses on a growing sector of the economy and plans for the future. It will provide living wage jobs for East Portland and the community. It embodies the triple bottom line goals and objectives we seek for the region, promotes sustainability and our natural resources, provides local growth for a minority entrepreneur and our regional economy, and is a concrete measurable example of investment in a minority business, which promotes real measurable economic equity.

Please support this innovative business as it captures the spirit of Oregon!

5. I would like to express to you my support for the transfer station franchise proposal that is being submitted by City of Roses Disposal and Recycling. My support comes in the fact that COR is a locally and minority owned business that has been in the community since the early 1900's. They are an innovated leader in the recycling industry and bring a wonderful value to our community. Between their sustainable ways and the great value they bring to the community by offering jobs in the community and keeping profits local, they have my complete support in this matter.
  
6. We as a family in the Argay neighborhood are vigorously opposed to a new transfer station off 138th. The traffic on 138 is already congested because of Costco being on that street not to mention the railroad tracks and the back ups on Sandy Blvd as well. We already have traffic issues on Sandy Blvd why escalate the traffic issues we endure already? There will be traffic accidents with trucks entering and leaving the station. This site might produce contaminated water runoff near the Columbia River because it of its drainage system. We are concerned also about the odor, noise and more rats in our neighborhood. We don't believe that we need another transfer station when we have two closeby in Troutdale and one at Metro. Don't allow this station at this location here! It's a very bad idea!
  
7. I know there is a meeting coming up this Tuesday which I will be attending. I am told we will not be able to participate and will only be able to listen. Therefore, I would like voice my concerns now regarding the potential location of the Waste Transfer operation slated for 138th off of Sandy Blvd. I am not in favor of the Transfer Station being relocated to this property and feel it is a very bad addition for our surrounding neighborhood. I would like my concerns voiced at this meeting.  
This proposed Transfer Waste station is very close to one of the largest undeveloped properties in Northeast Portland. The Rossi/Guisto/Garre Farms property located at 122nd and Shaver, near Parkrose high school. This land is slated for a major residential and commercial development and is in the proposal/planning process at this time. Having a dump located just on the other side of Sandy Blvd. is not conducive to "upgrading" the Parkrose/ Argay neighborhood

and definitely not a “plus” for selling the commercial and more importantly, the residential development of this location.

Sandy Blvd is already a major traffic / commuter route. With only single lanes in both east and west directions, traffic congestion is already heavy at most times of the day. Adding major truck traffic for the transfer station will only make traffic worse, adding more early morning noise pollution as well. I have additional concerns about air quality for our neighborhood. The prevailing wind often comes along the river. Having a “wet” as well as dry transfer station is concerning. The odors associated with this type of operation are not pleasant for the surrounding neighborhood. This type of “wet” and “dry” waste are also a breeding ground for rodents and other garbage related pests. The increased traffic and air quality will decrease the desirability and livability of the surrounding area. With the increase in homeless camps, tent cities in the slums and along the bike paths and freeways along with the east counties focus on affordable housing, we do not need one more development that makes our area less desirable and livable. A more remote location that is not in direct proximity to existing and planned residential neighborhoods would be a better solution. There is land further out in Gresham and Fairview that have better I-84 access that would be more suitable for this Transfer Station.

The proposed location on 138th off of Sandy should be developed with similar types of businesses as the surrounding area. Warehouses, regional offices and sales outlets would be a better development for our neighborhood.

I hope you will strongly voice these concerns at the upcoming meeting. I speak for many of my neighbors who have discussed with me their opposition to the location of this proposed Waste site.

8. We as a family in the Argay neighborhood are vigorously opposed to a new transfer station off 138th. The traffic on 138 is already congested because of Costco being on that street as well. There will be traffic accidents with trucks entering and leaving the station. We are concerned also about the odor, noise and more rats in our neighborhood. We don't believe that we need another transfer station when we have two close by in Troutdale and one at Metro. Don't allow this station at this location here! It's a very bad idea!
9. I would be interested in a public meeting regarding this transfer station. I think the location off 138 is bad because of the existing traffic issues with Costco there. Will you consider a meeting? What do we do to make it happen?
10. The volume of trucks this will bring to an area that already is extremely congested will be INSANE. Does anyone have any knowledge of this area? Costco is right there causing constant traffic jams. The plan does not seem thought out or vetted in any way. Please reconsider this. It will be terrible for the adjacent neighborhoods that already have to fight constant long lines of traffic on Sandy Blvd. OY!

11. I have used City of Roses Disposal and Recycling in the past to recycle construction debris from a remodel we were doing on our home. We were drawn to this company because of their ongoing commitment to the community, the fact that they are a minority owned business, and the emphasis they put on sustainability not only for the environment but the social and economic aspects as well. When I found out that they were looking to grow their business by opening a transfer station I was very excited and knew that I needed to lend them my support as a community member. This is the type of business that we as a community need to get behind; we should encourage their growth as a locally owned business who is investing their profits back into the area to the benefit of the future of Portland. In closing, I would like to thank you for your service to the community as the Solid Waste Authorization Coordinator with Metro.
  
12. We have lived in the Argay neighborhood for 48 years and are strongly opposed to the proposed garbage transfer station off NE 138th and Sandy Blvd. We have not objected to the previous requests for the recycling transfer stations (which are self contained). However, this transfer station will process garbage and will pollute the neighborhood with obnoxious odors. This proposed transfer station is too close to existing homes and apartments. There are many low income apartments on NE Sandy Blvd that will be only one block from this proposed station. It is very unfair to put such a facility in an area where there are many low income residents. There are also many homes just two blocks away. Our property values would be greatly affected as well as livability. We will be unable to spend time outside without smelling this garbage facility.  
We are also concerned that this will produce more rats in our neighborhood. We are already plagued with rats from the homeless RV's that park nearby, leaving their garbage by the side of the road. In addition, we are concerned about the noise. The existing businesses north of Sandy Blvd already produce continual low level noise during the day. Another concern is additional traffic. Traffic at the intersection of 138th and Sandy Blvd is already congested because of Costco being on that street. There are also the railroad tracks. All this causes considerable traffic backup on Sandy Blvd in both directions as well as on 138th heading south. Since we already have traffic issues on Sandy Blvd, why escalate the traffic issues we endure already? There could be additional traffic accidents with trucks entering and leaving the station.  
A further concern is this site might produce contaminated water runoff near the Columbia River because of its drainage system. If there is a need for another transfer station, it should NOT be built so close to homes. There are many other locations closer to Airport Way that would be away from any homes. Also lots of empty area east of 181st. Please, don't allow this transfer station at this location! It's a very bad idea and will greatly harm the Argay neighborhood.
  
13. The location at NE 138th that you have selected for a potential Waste Transfer location is a very poor decision by Metro.  
You have selected a high-traffic area that is consistently backed up and congested at all times of day. The streets are narrow and can't handle the amount of cars and trucks today let alone adding more trucks to the streets. Building a Transfer Station at this location will cause traffic

that the streets are not able to handle. The streets are at capacity right now. Having large Garbage Trucks hauling in and out will reek havoc on the traffic flow not to mention the bad odor that will waft through the adjoining residential neighborhood. The Gorge Winds consistently blow down Sandy Blvd at 138th and will spread the foul odor. The quality of air will deteriorate rapidly. You need to find a more remote location that will not adversely affect traffic patterns and cause air pollution to residential neighborhoods.

Metro claims to be community-focused and friendly to Portland residents' needs. Approval of this Transfer location will have a very high-impact negative affect on many, many levels. The Parkrose residents are currently working with the City, on a major Project, to improve the livability and desirability of the Parkrose Neighborhood. Having a Garbage Dump for a neighbor will decrease our Property Values significantly which will result in less Property Taxes for you to use.

14. As a Tax Payer, in Argay/Parkrose, I am requesting that you conduct a Public Hearing on Metro's decision to locate a Transfer Station (Garbage Dump) on NE 138th Avenue.  
I am unclear as to why Metro would make such a decision with a 2-lane Road on Sandy Blvd. that intersects with the narrow 2-lane road on 138th. This infrastructure cannot even handle the current traffic flow let alone adding multiple large Garbage Trucks to the already backed up traffic lanes.  
Metro needs to have some consideration and respect for the Tax Payers who support Metro and Metro should not make these kind of negative impact decisions without Tax Payer feedback. Please schedule a Public Hearing ASAP and notify the neighborhood of the date, time and location.
15. I wanted to take a moment and express my support of the transfer station franchise proposal being submitted by City of Roses Disposal & Recycling. There are many reasons I support this, but some key reasons that stick out in my head are that they are locally owned, it's a minority owned business (first African American xfer station in the state), and they go above and beyond to keep their profits local. In addition to this they are a true leader in recycling and innovation and this would be a strong job boost for East Portland. If you have any questions, please don't hesitate to reach out and thank you for taking the time to read my email!
16. I would like to express my support for City of Roses Disposal and Recycling and their transfer station. I love the fact that they are a minority owned company that provides jobs to other minorities and convicted felons. This goes along with their goal of full sustainability; environmentally and socially.
17. Please accept this note of support for the franchise proposal submitted by City of Roses Disposal and Recycling.

18. I am against this garbage transfer station in my neighborhood of Argay Terrace for many reasons. Smell, traffic concerns, vermin, etc. I could go on but I'm sure you have heard other people's concern already. I would like to request a public hearing. I do not think sending a post card in the mail is sufficient notice.
19. As a customer of City of Roses Disposal & Recycling, I am in support of the transfer station franchise proposal that was submitted by them. City of Roses Disposal & Recycling is a locally minority owned business that promotes sustainability while continuing to be a leader in recycling and innovation. As a N/NE Portland native, I have witnessed the gentrification and displacement of the African American community and I believe that it would serve the community well if the proposal was granted.
20. My wife and I oppose the transfer station on 138th of sandy blvd. we live in the Argay neighborhood and it's not a good idea!
21. I just wanted to write in support of the transfer station franchise proposal being submitted by City of Roses Disposal & Recycling. Not only are they a company that is centered around sustainability, it they are a locally owned business. Both of these points alone are reason enough for my support. Things like being the first African American transfer station in Oregon, or that this family has been a part of this area since the really 1900's.. these are just more of a reason for my support. Please consider!
22. I write in support of the transfer station franchise proposed submitted by City of Roses Disposal & Recycling for a number of reasons, but in particular, because their ownership is a local, minority- and family-owned, and it is a registered Benefit corporation. City of Roses has led to efforts in job creation, sustainability, innovation, and civic engagement for our city. The owners are family that is from our community, with generations in Portland going back to the early part of last century.  
Thank you for considering my letter of support.
23. This letter is in regard to the City of Roses Disposal and Recycling COR Transfer Station Station and CORE Recycling Material Recovery Facility proposed off of 138th and NE Sandy Blvd. I have a number of concerns which I have listed below, all of which comprise my objections to these two facilities, objections which I believe all those in my community share as well.
- Noise
- The noise that these facilities stand to generate concerns me greatly: back-up beepers, machinery, trucks, etc.
  - Will a sound level survey be conducted?
  - What levels of sound are deemed appropriate and at what distance will these various sounds be audible?

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- What will the days and hours of operations be?

### Odor

- The inevitability for odors emanating from these facilities, especially one categorized as taking “putrescent” waste, is another cause for extreme alarm.
- What methods will be used to control odor?
- Is there an “acceptable” level of odor? If so, at what distance is this odor deemed acceptable?

### Chemical and Biological Pollutants

- What control measures will be taken to not only minimize, but completely eliminate, the risk of chemical and biological pollutants being released and/or accumulating in these two sites?
- Facilities like these have the high probability of being feeding grounds and general harborage for pests. An explosion in the population of pests in the community is another great concern. What effective pest control measures will be taken?

### Truck Traffic

- We will already be experiencing an increase in traffic due to the new Castlegate Apartment Complex. Has a traffic impact study been conducted?
- Where will the main entry and exit points be for trucks and other vehicles? This is important to consider given the following:
  - NE Sandy Blvd is a 2 lane “highway,” in fact, all routes in this area save for Airport Way only have 2 lanes
  - Airport Way going West often becomes impassable after 2pm on weekdays due to people commuting back into Washington
  - 138th, a main connecting route from Airport Way to Sandy, which is also just 2 lanes, is often choked by traffic to and from Costco
  - Train traffic traveling parallel to Sandy Blvd often blocks the ability to cross back and forth from North to South for extended periods of time at various intersections
  - NE Fremont St. is a 2 lane residential thoroughfare with a cut-through on NE 141st to Sandy and is not a reasonable route for increased truck traffic

For each of these concerns, I would like to know what governing agencies – local/state/federal government and/or third party auditors – are responsible for inspecting and enforcing any and all measures City of Roses Disposal and Recycling commit to taking to mitigate each of these concerns that have a direct impact on the health, finances / property value, and general wellbeing and livability of the residents in this community, including myself. At what intervals are inspections to be conducted and any applicable re-certifications re-issued? What recourse do residents have to file meaningful and actionable complaints should these agencies not be effective?

I would also like to request a hearing regarding these facilities.

As I mentioned above, this list of concerns – which is by no means comprehensive – serve as the reasons for my strong objection to these two facilities. Some of the questions I ask, while I am interested in the answers, also serve as an almost comical and certainly rhetorical list of reasons

why the proposed locations for these two facilities is incomprehensible. Why would facilities such as these be considered, let alone approved, for installation this close to residential areas? It is beyond rational thought why area residents should have to hear, smell, and see these types of facilities from their backyard, patio, porch, or Community Park.

I appreciate the opportunity to submit this comment and I look forward to your response and the hearing on these two facilities.

24. Just a quick Friday email in support of the transfer station franchise proposal being submitted by the locally minority owned City of Roses Disposal & Recycling based in NE Portland. The geographic location makes real sense at 138th and Sandy Blvd. Strategically located for less fuel consumption and material handling. It's also in a industrial spot away from the community. Thanks for considering this good idea for METRO and the people it serves.
25. I am writing you regarding the proposed COR Transfer Station Station at 4530 NE 138th Ave, Portland, Oregon, to be operated by City of Roses Disposal and Recycling. I would like to voice my support for the approval of the Transfer Station and provide you with some insight about why I take this position.
- City of Roses Disposal and Recycling has an exemplary history of operations in Portland, already having operated other waste management facilities and transfer stations in the area for over 20 years. Alando Simpson, Vice President and owner of COR Disposal and Recycling, has a long history of service to the community and environmental responsibility and stewardship evidenced by his extensive resume. This includes serving on the board of the City of Portland Small Business Advisory Council, the National Association of Minority Contractors of Oregon, as well as the Oregon Sustainability Board. Mr. Simpson also serves on the Oregon Transportation Commission as PAC Co-Chair.
- City of Roses Disposal and Recycling was started in 1996 by Al Simpson, the father of Alando Simpson, becoming the first waste company in the United States fully owned by African Americans. Both Al and Alando have striven to maintain a highly diverse, well-paid workforce, with a focus on providing quality jobs to the community while working to protect and preserve the environmental sustainability and livability conditions in the Portland metro area.
- I have worked in the recycling, carting and environmental sustainability sector in Portland for as long as City of Roses Disposal and Recycling has existed. It has been my privilege and honor to consider both Al and Alando Simpson friends and business associates for many of those years. In my own 20+ years in the industry, I have found City of Roses Disposal and Recycling to be among the most well managed organizations I've interacted with. They have a true passion for creating a sustainable Portland and exercise extreme care for neighborhoods they operate in, the citizens of those communities, and the Portland-Metro area as a whole.
- In closing, I wish to point out that the facility location being proposed was previously

licensed to another firm to perform, greatly, the same services being proposed at the new facility. While that previous operation never got off the ground at the proposed location, I can say with full certainty that City of Roses Disposal and Recycling has the know-how to do the operation the right way. This will provide additional solid waste processing capacity that is badly needed in the City of Portland.

By approving this facility, METRO would be sending a strong message that a) it fully supports responsible recycling operations; b) is strongly committed to supporting minority owned local business, c) supports environmental sustainability efforts of the greater Portland metro area; and d) is committed to creating new jobs, diverse workforce initiatives and general economic opportunity to the communities it serves.

Thank you for your time and consideration in this effort.

26. I currently use City of Roses Disposal and Recycling for remodeling our home. This is a minority owned business and with me being a minority I feel like it was best to support this business. This company is family owned and they've been apart of the community since the early 1900's. They're all very professional, affordable and overall just great people. love using them also because I know they're guaranteed to recycle our debris from my house. I'm very excited about this transfer station if all goes well. As a community member and someone who currently still uses the company, it's only right I support them. This company has grown tremendously and I can't wait to see what's still to come.
27. I am writing regarding the COR Transfer Station station on 138th. I live in the Argay neighborhood and am very opposed to a new transfer station. The traffic on 138th is already congested because of Costco, the railroad tracks, and increased traffic on Sandy Blvd. The morning and afternoon gridlock on Sandy is unnavigatable now. This site will undoubtedly produces contaminated water runoff and will impact the Columbia River. We are concerned also about the odor, noise and more rats in our neighborhood. We don't believe that we need another transfer station when we have two close by in Troutdale and one at Metro. Don't allow this station at this location here!
28. As a resident in the Argay neighborhood, I vigorously oppose a new transfer station off 138th. Has a traffic analysis been completed for the increased truck traffic and number of vehicles in Sandy and at 138th with Costco bringing in so much already? Has an impact study been completed for environmental sustainability to ensure health of the neighbors and Columbia River Watershed? Why not? We are concerned also about the odor, noise and more rats in our neighborhood. Has an impact study been completed for home values and quality of life/livability with a waste management center so close to homes? As a home owner, I have only read nightmare stories about living next to recycling and waste from the families in these areas and expect we would suffer the same. What about when the farms are sold and developed for more housing and business? This will

likely drive away residents and businesses from investing. We don't believe that we need another transfer station when we have two close by in Troutdale and one at Metro. Don't allow this station at this location here! It's a very bad idea!

29. I am writing in support of the transfer station franchise proposal being submitted by the City of Roses Disposal & Recycling. City of Roses is the first African American-owned transfer station in the State of Oregon and is recognized for its leadership in sustainability, recycling and social equity – it invests in blighted communities, keeps its profits local as a locally-owned benefit corporation, and creates jobs in East Portland. I have worked with City Roses for more than a decade in my previous position as a director at the Portland Development Commission and as current vice chair of the Metropolitan Contracting Improvement Partnership (MCIP) and the Hispanic Metropolitan Chamber of Commerce, and I have never met a better community partner. This family-owned business is exactly what Portland needs, and this proposal is crucial for its business plans to create jobs and keep them local. Please feel free to contact me if you need any more information or would care to discuss.
30. As residents of the Argay neighborhood, we are expressing concerns with the proposed Metro authorized franchise, COR Transfer Station Station at 4530 NE 138th Avenue, Portland. A response to our concerns is requested.
- Positives: In reviewing the application, the company-CORE Recycling- demonstrates strong knowledge and experience with the proper handling of its business to process and dispose of, or recycle, waste products. Their application plans more than adequately address issues of that business including acceptable waste materials; processes to review, contain, and dispose of acceptable and unacceptable or unsafe materials; environmental impact and safety; pest control; and noise reduction or abatement issues.
- Negatives / Concerns: Traffic impact, management, and related safety issues are not requested nor addressed in the application process. The company's application estimates initial traffic volume – use by 10-30 trucks per day, with a potential and goal for increases beginning in Year Two. Also, the application states that certain property-specific paving and road management will be addressed eventually.
- We could not see if Metro's application process contained or requested traffic impact or traffic management studies, and subsequent plans for the surrounding roadways. If those elements had been included, a study or review would show that traffic along adjacent Sandy Blvd (from NE 122<sup>nd</sup> Ave to NE 148th Ave) and along NE 138th Avenue (NE Sandy Blvd and NE Airport Way due to Costco Warehouse) is frequently extremely congested. The adjacent major commercial railway frequently stalls traffic on both of the arterial roadways. The addition of several large commercial waste disposal trucks per day will further congest the two roadways, adding to safety issues, potential for traffic accidents, and driver impatience, aka "road rage". What is traffic flow capacity for these roadways?
- 1- Please address the issue of traffic impact, management and related safety plans for the new COR Transfer Station Station on NE 138th Avenue.

2 - Please describe the preferred method(s) and agency(ies) for reporting observations of COR Transfer Station franchise not fulfilling its management plans, and when traffic exceeds capacity.

31. As a resident and active community member in the City of Portland, I am writing in support of COR Transfer Station's application for a new Metro solid waste franchise. After reviewing their application, I believe that their business would serve our City needs. I am impressed by COR Transfer's proposed approach to working with community members in the area through their master planning process for the site and innovative ideas for material recovery. Also, given limited industrial zoned land and the community lens COR brings as well as M/W/ESB goals for the City, I support the approval of this application.
32. I live in the Wilkes Neighborhood and I am vehemently opposed to the COR Transfer Station Station proposed at 4530 NE 138th Ave.  
This area can not withstand the additional traffic and safety hazards. The intersection at NE Sandy Blvd and NE 138th Ave is currently horrendous. Sandy Blvd is only a two lane street as is 138th Ave. Train tracks run parallel to Sandy Blvd and prevent traffic from turning onto 138th when there is a train. That wait for a train can be lengthy at times which creates a huge backup of traffic on Sandy Blvd.  
Costco at this location on NE 138th Ave is extremely popular, not only for those of us in Portland and the surrounding area, but in addition draws an incredible amount of traffic from Vancouver and the surrounding area. This is the only Costco location on this side of the city. Their gas station was so busy that they had to increase the size, and yet there is still a huge backup of traffic waiting for gas at times. There are many times when they have multiple deliveries of gas just to service the need, not to mention the trucks making deliveries to stock the warehouse. And there is a backup of traffic on 138th waiting to make that left hand turn into Costco.  
Western Pacific Trucking School is also there on NE Whitaker Way putting additional big trucks on the street increasing traffic. The Columbia River Slough is right there. What will the environmental impact be with a transfer station?  
I strongly urge you to deny this application for a new Metro Solid Waste franchise.
33. I wanted to express my support for the transfer station franchise proposal being submitted by City of Roses Disposal & Recycling. I think it is important we consider that they are a company that is locally owned, minority owned, focused on sustainability and they are creating job opportunities in a community who needs it.  
Thank you for your attention to the matter.
34. My name is Laura Tokarski, and I am the Executive Director of Trash for Peace. I am writing to support the transfer station franchise proposal being submitted by City of Roses Disposal & Recycling.

From our experience working in the solid waste and recycling field (mostly through education and outreach), we find it is not every day we work with a hauler who genuinely cares about reducing waste and recycling, and who cares about the sustainability of our planet. City of Roses is one of those organizations.

They are also a locally and minority owned business, they are a benefit corporation, they invest in our community and are willing to partner with organizations such as my own to work towards a cleaner and safer Metro region.

I have no doubt that their increased participation in this industry will make our region better. Feel free to call me if you have any questions.

35. As an East Portland resident and business owner, I wholeheartedly support the City of Roses Disposal and Recycling transfer station in the Historic Parkrose district. This proposal is beneficial for East Portland for multiple reasons. First, this local, family owned business will bring much needed living wage job opportunities to East Portland residents. This is a top priority for the East Portland Action Plan, of which I am the co-chair of the Economic Development Sub-committee.

Further, this business investment is within the Historic Parkrose Neighborhood Prosperity Initiative's service area, which has been identified as a priority area for commercial revitalization in Prosper Portland's five year strategic plan. As the former executive director of the Division Midway Alliance, East Division Street's NPI area, an investment like this aligns directly with Historic Parkrose's revitalization efforts.

Portland has historically supported small, local business, and the City of Roses Disposal and Recycling is exactly that type of business. As the United States sees more and more disposal companies purchased by corporations, it is essential that Metro support a local, multigenerational, family owned business with roots in the very community where it is investing.

Thank you for supporting the City of Roses Disposal and Recycling transfer station proposal; your support will help establish Oregon's first African American owned transfer station.

36. I am a HOA board member and resident of Jasper Heights Condominium. Our complex is located on 148th north of I-84 and south of Sandy. We continue to see traffic increases on 148th as it is a main arterial street for airport traffic, Costco traffic, business traffic, commuters, etc. As PBOT slows traffic down on the 4 lane streets in east county drivers continue to find other streets in the area where they can drive faster to get to their location.

Allowing additional traffic especially commercial trucks into this congested area is irresponsible and not on the path to making this area more desirable for residential housing as the land gets developed. There are lots of lower income rentals in the area where this transfer station would be located. These individuals are going to see the worse of the effects from this garbage and recycling station. I consider this another bad decision that is made by individuals who don't live in this area. Perhaps you come out here and see industrial, railroad tracks, junk yards, etc. but

there are nice neighborhoods with well maintained homes, condominiums, and apartments. We don't want this in our area. It's not compatible with our vision.

37. I am a resident of the Argay neighborhood and it has come to my attention that Metro is considering a transfer station on 138th. I am curious if anyone from Metro has ventured out here to review the current feasibility of added traffic on 138th. I travel this road regularly and during times that Costco is open for business it is a solid stream of traffic. If there is not a planned traffic light, the garbage trucks are going to have a difficult time entering and exiting the property. I have other concerns centered mostly on possible smells and varmints. I believe you owe it to the surrounding community to at least express how Metro plans to deal with the variety of issues that this transfer station could pose. I would also hope that government won't ignore the voices of those affected.
38. I live in outer Northeast, not far from where you want to make your solid waste transfer station. I am opposed to your proposed location and do wonder why you chose this location and also about the environmental impact for our area. The area is full of low income and other disenfranchised people. The surrounding roads are bumper to bumper at times during the day and when it isn't bumper to bumper people are significantly speeding because there is no regular police presence in our area. Increased traffic with garbage trucks, no sidewalks, and no police presence is scary to me.  
Please help make our neighborhood a better place, not a place that no one would want to live, given choices. Please reconsider this and do the right thing.
39. Even though I have not yet used City of Roses Disposal and Recycling services I am quite familiar with them. My father works for them and I know the type of business they run and I am familiar with everyone who works there. When I heard that they wanted to expand and open up a transfer station I was so excited to hear that because they are a company who offer opportunities to everyone that walks into their facility. I feel that with this new station they will be able to provide the community with job opportunities. This the type of business that we as a community need to get behind and encourage their growth as a locally owned business who is investing their profits back into our community.
40. There is already so much traffic in the area being proposed (there was a fatality on Sandy Blvd not to far from the site). Car traffic going in and out of COSTCO and plus the fact that Sandy Blvd. is a heavily traveled street from 205N to Gresham is significant. Not to mention the train tracks. I don't feel that this would be positive for the environment and those who live in the Argay area.
41. I am writing you due to my anxiety that large waste companies are possibly interfering with City of Roses Disposal and Recycling efforts for their new location by the airport. We have all seen way-too many times how these big guys destroy opportunities for the emerging, locally-owned

businesses, when these small operations are the background of our local economies and civic interests. Here we have a Benefit Corporation, minority owned, family enterprise which has been so dutifully engaged in the health and welfare of our entire community, and is finding struggles due to the influence of these out-of-state, well-funded organizations which care only to absorb dollars out of our region, not contribute. I urge you to support the transfer station franchise that the City of Roses is submitting.

42. Greetings and thank you for the chance to "chime in" on the discussion of the upcoming COR Transfer Station. I have been waiting for a new recycle location to handle the type items we used to recycle at the old NE Marx St. location, which has closed for good without a nearby location for an alternative. We used that place for years, decades with great appreciation. I am thinking that this new station will not be handling recycling but garbage instead. I may be wrong, but if that is the case, I would certainly be very concerned about this kind of operation so close to my home, which is also my business. Everyone knows what that stuff smells like and I am not at all interested in smelling garbage from my house. I remember a composting operation near my old place of employment near PDX that had to shut down after the smells and air born toxins were affecting nearby folks. If it's going to smell and be any kind of air issue, I am not for this location for such a project. Better to find a spot a bit further east to avoid costly public problems after it starts to smell in my opinion.
43. As a resident in the Argay neighborhood, I adamantly oppose a new transfer station off 138th. Traffic in that specific area is already at its maximum. If a study by PBOT has been done, you need to share it with the community. Sandy Blvd always backs up now almost every afternoon. Has an impact study been completed for environmental sustainability to ensure health of the neighbors and Columbia River Watershed? Why not? We are concerned also about the odor, noise and more rats in our neighborhood. Rats are already a huge problem here and I am sure this transfer station will just increase the problem. And the odor that will be in the air daily is not what homeowners want or should have to tolerate. As a home owner, I have only read nightmare stories about living next to recycling and waste from the families in these areas and expect we would suffer the same. What about when the farms are sold and developed for more housing and business? Rossi Farm area will be developed soon and but it is unknown yet as to what will be built there. Also the Kmart area. So both will probably bring more traffic. We don't believe that we need another transfer station when we have two close by in Troutdale and one at Metro. Metro sent us a flyer but why aren't we having some sort of community meeting on this issue? I think many neighbors may have missed this in their mail. We need a public meeting. This is a very bad idea.
44. We oppose the transfer station. I wanted to share with you our concerns as nearby homeowners. We are concerned about:

Increased Traffic (Currently, we already can hardly take a left or right on Sandy Blvd)  
Increased Smells  
Increased Vermin  
Increased Noise (We already have the planes flying over us, buses and existing traffic)  
We already have transfer stations in Troutdale and Metro that are close by. We do not need one located here. How much more can we take living in NE Portland.. Please.

45. I am writing you regarding the transfer station franchise proposal by City of Roses Disposal and Recycling. I have worked in the waste sector both locally and internationally for the past decade. I have not found a Portland waste business that better represents the values of inclusion, equity, job creation for disadvantaged folks, local development, and commitment to waste reducing/recycling than COR. We live in a state with an unfortunate history of racial exclusion, including in our waste sector, and there is work to be done to tip the balances towards a more equitable and inclusive business environment in Oregon and in Portland. We should be proud to have a African American-owned company in our city that is able to expand its work here, and as a city we should support such ambitions. I ask that you please do what you can to ensure that COR's proposal is accepted, and to help COR's neighbors understand the value and potential of having this type of business in our city.
46. I am writing to express support for the transfer station franchise proposal submitted by City of Roses Disposal & Recycling. As a family-owned and operated minority business, City of Roses has proven its commitment to responsible waste management as well as generating community benefits through its business operations. I believe they will bring the same level of commitment to this franchise opportunity, which is much needed in the Metro area.
47. Verde is a Portland-based non-profit focused on ensuring that low-income communities and communities of color participate and benefit from sustainability and environmental investments. Since 2005, Verde has worked at the intersection of sustainability, social justice and equity and has brought environmental infrastructure to low-income neighborhoods, engaged residents to design and implement these projects, and ensured that environmental investments contribute to community well-being.
- City of Roses is a long-standing partner and important part of our collective effort to build wealth in low-income and people of color communities. It's model of creating workforce and enterprise opportunities for people of color mirrors Verde's approach to solving environmental problems we face: create co-benefits that prioritize improving environmental conditions and increasing wealth among people of color who have been marginalized in the region's economic prosperity. City of Roses' proposal reduces VMT and emissions while increasing workforce and enterprise opportunities for low-income people and people of color while strengthening the region's only people of color owned hauler. An additive benefit: these dollars stay in the region.
- As with many environmental sector spaces, people of color are woefully under-represented in

decision-making, design and operation of environmental investments such as those Metro makes across its portfolio. We applaud Metro's recent efforts to examine equity across its portfolio including solid waste and make investments in increasing capacity in communities of color to understand and exercise increased control in decision-making of these investments. We urge Metro to continue this effort by approving City of Roses' proposal. Please contact me if you have any questions or need more information about Verde.

48. I would like to say that I support City of Roses Disposal and Recycling in becoming a transfer station franchise. This would be a locally owned business, who is a minority and the First African American transfer station in Oregon. Lets make Oregon great by being inclusive to all.

### **COR Transfer Station response to comments:**

In response to comments that were submitted from Kathy Liebowitz, Michael Satern, Rex Johnston, Carolyn Williams, Harley Gilson-Smith, Delores & Jim Livesay, Roger Rossman, Cheryl (Argay Terrace Resident), Susan Raethke, Jean Donohue, Jenny Stewart, Randy & Loretta Burmester, Brenda Scrivens, Patricia Donohue, Nancy Horsfield, Cathy Tennant, Marlene Rooney, Joseph Hooker, Robert Depew, please consider the following information below as our formal response:

1. *Thank you for your comments, as many of your concerns have been addressed through the City of Portland's land use hearing approval in the fall of 2018, we welcome your presence, comments and transparent dialogue at the upcoming public hearing which will be hosted by Metro at Shaver Elementary School on April 9<sup>th</sup> at 6pm.*

*We look forward to seeing you there!*

*Best,*

**Alando Simpson, LEED® GA**

CEO

**City of Roses Disposal & Recycling | COR**

In response to all additional comments submitted that were either in support and or neutral through the closure of the public comment period that ended on February 8<sup>th</sup>, please consider the following information below as our formal response:

- 2.

*We would like to thank all of those who submitted comments, letters of support and advocacy for the COR Transfer Station Station Franchise Application. As many of you know whether it be from our voices, the community's voice or simply our reputation as a 23 year old locally owned business we are humbled that there are so many of you out there who support our goals and aspirations around innovating and modernizing our solid waste industry for the 21<sup>st</sup> century. We are fully aware that we will not be able to be successful*

*without the community that has supported our business in the past as well as all of those who are supporting us going forward. We look forward to working with all stakeholders in the waste and recycling industry in a concerted effort to making the Metro Region a true model for what a triple bottom line closed loop ecosystem looks like. We welcome your presence, comments and transparent dialogue at the upcoming public hearing which will be hosted by Metro at Shaver Elementary School on April 9<sup>th</sup> at 6pm.*

*We look forward to seeing you there!*

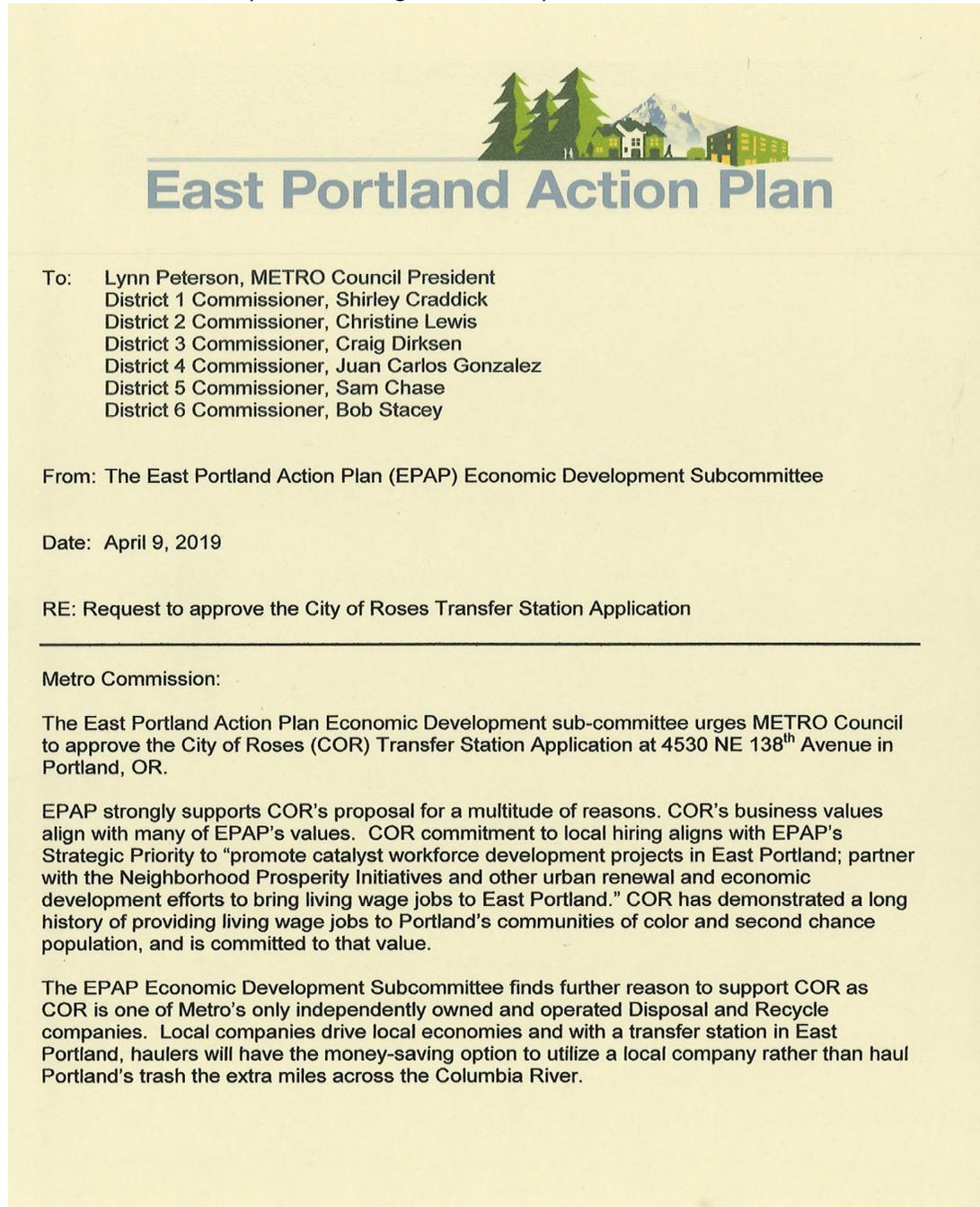
*Best,*

**Alando Simpson, LEED® GA**

CEO

**City of Roses Disposal & Recycling | COR**

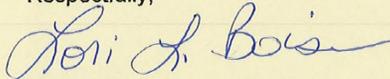
The East Portland Action Plan (EPAP) Economic Development Subcommittee submitted this letter to Metro and DEQ at the public meeting hosted on April 9, 2019:



COR has the distinction of being the United States' only Solid Waste B-Corporation, which underscores COR's commitment to sustainability. COR is dedicated to creating new and innovative ways to deal with urban wood waste, which has led to the development of an on-site cross laminated plywood production facility that processes post-consumer lumber waste.

Thank you for your time and consideration of this request.

Respectfully,



Lori Boisen  
EPAP Economic Development Sub-committee Co-Chair