



Regional System Facilities Plan

Public comment report

A summary of comments received during the comment period for the draft Regional System Facilities Plan from Oct. 1 to Nov. 6, 2024

December 2024

If you picnic at Blue Lake or take your kids to the Oregon Zoo, enjoy symphonies at the Schnitz or auto shows at the convention center, put out your trash or drive your car – we’ve already crossed paths.

So, hello. We’re Metro – nice to meet you.

In a metropolitan area as big as Portland, we can do a lot of things better together. Join us to help the region prepare for a happy, healthy future.

Stay in touch with news, stories and things to do.

oregonmetro.gov/news

Follow oregonmetro



Metro Council President

Lynn Peterson

Metro Councilors

Ashton Simpson, District 1

Christine Lewis, District 2

Gerritt Rosenthal, District 3

Juan Carlos González, District 4

Mary Nolan, District 5

Duncan Hwang, District 6

Auditor

Brian Evans

600 NE Grand Ave.

Portland, OR 97232-2736

503-797-1700

TABLE OF CONTENTS

INTRODUCTION	1
RESPONSE TO COMMENTS	1
Chapter 1. Introduction	1
Chapter 2. Values and Outcomes	2
Chapter 3. Existing System and Gaps	3
Chapter 4. Investment Strategy – Community Drop-Off Depots	6
Chapter 4. Investment Strategy – Reuse and Repair	18
Chapter 4. Investment Strategy – Organics	24
Chapter 4. Investment Strategy – Commercial Transfer Stations	26
Chapter 5. Supporting Policy Actions	28
Chapter 6. Cost and Financing Approach	32
Chapter 7. Implementation and Monitoring	35
General comments	37
APPENDIX: PUBLIC COMMENT SUBMISSIONS	40

INTRODUCTION

This document addresses the comments submitted to Metro about the draft Regional System Facilities Plan during the public comment period from Oct. 1 to Nov. 6, 2024. The draft Regional System Facilities Plan is a long-term plan for investing in facilities and infrastructure across the region to meet the goals of the 2030 Regional Waste Plan.

Over the comment period, Metro received multiple comments from a total of 14 individuals and local government and industry representatives. The comments were submitted through an online comment form or by email. The report's appendix includes all online comment form entries and emailed letters received.

RESPONSE TO COMMENTS

This section presents public comments received through an online form or by email. Comments are organized by the section of the plan they address, with a separate section for more general comments that apply to the entire plan or areas of work outside of the plan. The comments received are included in the appendix.

Each comment in this section is followed by Metro response. For most comments, the response identifies how the plan already addresses the comment. In some instances, however, the response indicates the plan will be revised based on that comment.

Chapter 1. Introduction

No comments submitted referenced the introduction chapter in the draft plan.

Chapter 2. Values and Outcomes

Entry	Date	Name	Affiliation	Position or connection to project
12	11/6/2024	Donnie Oliveira	City of Portland	Deputy City Administrator

Comment 2.1:

Chapter 2. Values and Outcomes

- The City supports more coordination with cities and counties in further infrastructure analyses.
- The City supports municipal and county involvement in the establishment of community benefits agreements identified on Page 10 of the draft System Facilities Plan.
- The draft System Facilities Plan calls for ancillary spaces such as viewing rooms and displays (page 9) or parks and meeting rooms (page 10). We recommend breaking these out as optional in the Draft SFP and exploring funding them through means other than waste fees.

Response: Further analysis of the proposed investment projects, establishment of community benefits agreements and features of new facilities such as viewing rooms and meeting spaces will be defined during plan implementation. Chapter 7 in the draft Regional System Facilities Plan describes how each investment project in the plan will go through a process of refinement, design and development prior to implementation. Additionally, Metro staff are proposing to add more details to Chapter 7 in the final plan that Metro Council will consider for adoption in early 2025. The proposed additions will describe more fully how Metro intends to collaborate with city, county, tribal, state, non-profit and private industry partners to implement the plan's investments, as well as the oversight roles of Metro Council and the Regional Waste Advisory Committee.

Chapter 3. Existing System and Gaps

Entry	Date	Name	Affiliation	Position or connection to project
12	11/6/2024	Donnie Oliveira	City of Portland	Deputy City Administrator

Comment 3.1:

Chapter 3. Existing System and Gaps

- The City agrees with the assessment that the biggest gaps in addressing Household Hazardous Waste and self-haul options are in Washington County and eastern Portland, Gresham, and Troutdale. We would characterize infrastructure priorities as (1) east-side and west-side access to HHW and residential self-haul of waste, (2) organics, and (3) addressing commercial transfer.

Response: In response to this and similar comments, Metro staff are proposing changes to the final plan that Metro Council will consider for adoption in early 2025 to prioritize investments in community drop-off depots in Washington County and East Multnomah County. In particular, staff propose to amend the conceptual implementation schedule table on page 59 of the draft Regional System Facilities Plan to show construction of the East Multnomah County depot (described on pages 33-34) starting toward the beginning of phase 1 and delaying construction of the North Portland depot (described on pages 27-28) until phase 2.

Entry	Date	Name	Affiliation	Position or connection to project
12	11/6/2024	Donnie Oliveira	City of Portland	Deputy City Administrator

Comment 3.2:

Chapter 3. Existing System and Gaps

- A gap not currently addressed in the Draft SFP is options for materials containing asbestos and lead paint. Hillsboro is the nearest disposal location serving generators with more than de minimis amounts of untested material or material testing positive. Is it worth examining whether our transfer system can offer greater service in this space?

Response: Access to facilities that accept asbestos-containing materials and lead paint from the public is partially addressed in the household hazardous waste section of the technical analysis report that was completed during phase 2 of the project, which informed the draft Regional System Facilities Plan.¹ Five of the community drop-off depots in Chapter 4 of the plan (Cornelius, North Portland, Metro South, East Multnomah County and Southeast Washington County) are proposed to have household hazardous waste facilities like the ones that exist today at Metro Central and Metro South. The proposed facilities would accept small quantities of lead paint and asbestos-containing materials from households as well as businesses that qualify under the Metro Very Small Quantity Generator program. Gaps in facilities for

¹ Metro (2023). Garbage and Recycling System Facilities Plan: Facility gaps assessment summary report. Available online at: oregonmetro.gov/sites/default/files/2023/08/14/SFP_Technical-Analysis-Summary-Report.pdf.

generators of larger amounts of asbestos-containing materials and lead paint were not analyzed during the project and are not addressed by the draft plan. This is an area that needs further research and is likely to require costly infrastructure investments and will have strict permitting requirements. As the comment notes, the Hillsboro landfill is the only permitted facility in the region that is able to accept large quantities of asbestos-containing materials and this facility is a special purpose landfill designed to meet more stringent federal and state regulatory standards than the Metro household hazardous waste facilities.

Entry	Date	Name	Affiliation	Position or connection to project
12	11/6/2024	Donnie Oliveira	City of Portland	Deputy City Administrator

Comment 3.3:

Chapter 3. Existing System and Gaps

- The technical gap analysis did not identify self-haul for yard debris as a gap. It may be appropriate to reconsider whether that is a necessary aspect of new self-haul investments.

Response: Metro did not include an assessment of facilities that accept yard debris from residential self-haul customers in the technical gap analysis due to the widespread availability of on-route/curbside yard debris collection services offered by cities and counties. All cities and counties within the Metro jurisdictional boundary are required to provide regular, on-route yard debris collection service to single-family households, and the service is also widely available in areas outside the boundary. In addition to curbside service, many of the facilities included in the technical gap analysis report also accept yard debris from residential and business self-haul customers including landscaping businesses (described on pages 30-34 and in Table A9).² The proposed network of six community drop-off depots in the draft Regional System Facilities Plan could increase access to facilities that accept yard debris from residential and business self-haul customers and offer consistent pricing for these services across the region. As Chapter 7 describes, each investment project in the plan will go through a process of refinement, design and development prior to implementation. This process will provide local governments and communities with the opportunity to consider whether or not to include self-haul yard debris service at each drop-off depots.

² Metro (2023). Garbage and Recycling System Facilities Plan: Facility gaps assessment summary report. Available online at: [oregonmetro.gov/sites/default/files/2023/08/14/SFP_Technical-Analysis-Summary-Report.pdf](https://www.oregonmetro.gov/sites/default/files/2023/08/14/SFP_Technical-Analysis-Summary-Report.pdf).

Entry	Date	Name	Affiliation	Position or connection to project
12	11/6/2024	Donnie Oliveira	City of Portland	Deputy City Administrator

Comment 3.4:

Chapter 3. Existing System and Gaps

- The Draft SFP calls for some approaches that break with the Regional Waste Plan (i.e. Actions 16.4, 16.5). We suggest acknowledging and reconciling differences where possible and explaining where Metro believes a change in approach is warranted.

Response: Regional Waste Plan action 16.4 is to “Maintain public ownership of facilities to ensure that a range of services are accessible to residents at equitable and affordable rates.” The draft Regional System Facilities Plan does not break with this action since under the plan, both Metro Central and Metro South continue to be owned by Metro and all proposed new community drop-off depots and reuse and repair facilities are envisioned to be owned or leased by Metro. Ownership of the new commercial transfer station discussed on pages 47-48 will be determined through the phased approach described in that section.

Regional Waste Plan action 16.5 is to “Evaluate the feasibility of establishing a publicly owned facility in Washington County to accept and transfer garbage, recycling, food scraps, household hazardous waste and other materials.” Implementation of this action started with the project that led Metro to acquire a property in Cornelius for potentially siting a full-service transfer station there. Metro Council then directed staff to take a holistic view of the reuse, recycling and garbage system and develop a plan for investing in facilities through the Regional System Facilities Plan project. The draft plan is the culmination of that project and proposes to build two community drop-off depots in Washington County, as well as exploring partnerships with private facilities to expand access to organics transfer services and additional self-haul depot services.

Chapter 4. Investment Strategy – Community Drop-Off Depots

Entry	Date	Name	Affiliation	Position or connection to project
3	10/23/2024	Peter Brandom	City of Cornelius	City Manager

Comment 4.1: If a community drop-off is ultimately planned for the Metro parcel in Cornelius, we ask that you please minimize the footprint of the facility to accommodate the need and dispose of the remaining acreage. This land in our industrial zone is incredibly dear, and can be used for critical, impactful job creating business activity by private industry. Our property tax revenues are 58% comparatively to all Washington County jurisdictions' combined average, and we have no other significant revenue sources at this time. We also have among the highest daily out-migration of employment and highest average commute time in the region, making local job creation a crucial need.

Response: There will be opportunities to provide input on the design of the Cornelius community drop-off depot during plan implementation. The facility footprint will be determined with input from the public including Cornelius community members and Metro advisory committees, with Metro Council serving as the final decisionmaker. The implementation process will also provide opportunities to discuss and finalize community benefits associated with the new facility, such as community enhancement grants and community benefit agreements.

Entry	Date	Name	Affiliation	Position or connection to project
3	10/23/2024	Peter Brandom	City of Cornelius	City Manager

Comment 4.2: Fees assessed for self haul and other services at these facilities should be much lower than those charged at the private facilities. If needed, these services can be discontinued at private facilities, which can then focus on large waste transfer.

Response: Customer fees at Metro solid waste facilities are designed to cover the cost of providing self-haul garbage disposal and other services to the public. Similarly, fees at the proposed community drop-off depots will be necessary to cover service costs. Metro anticipates that fees at the new facilities will be comparable to fees at the existing Metro transfer stations, recognizing that fees may increase with time to account for growing labor and operation costs. As with the existing Metro transfer stations, Metro expects that customer fees for self-haul garbage disposal, yard debris and organics services at the new drop-off depots will be determined through Metro's annual budget development process, guided by the Metro Council fee setting policy and with input from the Regional Waste Advisory Committee and other interested groups. More information about Metro's budget and solid waste fee setting process, including reports from independent reviews, are available at: oregonmetro.gov/waste-prevention-and-environmental-services-budget-and-solid-waste-fee-setting.

Entry	Date	Name	Affiliation	Position or connection to project
3	10/23/2024	Peter Brandom	City of Cornelius	City Manager

Comment 4.3: Please define what is meant by "affordable" as stated on page 26 relative to "self-haul disposal services," and elsewhere in the plan.

Response: "Affordable" in this instance, and elsewhere in the plan, means that costs charged would be tied to, and cover the cost of, providing self-haul services to the public, and that they would be the same across all Metro-owned facilities. Metro's System Facilities Plan Technical Analysis Summary Report³ documents a significant discrepancy in the costs charged across facilities that accept mixed garbage from the public. For example, when the analysis was conducted, the lowest flat fee at Forest Grove Transfer Station (\$75) was double that of the minimum fee at Metro Central and Metro South transfer stations (\$35).

Entry	Date	Name	Affiliation	Position or connection to project
4	10/22/2024	Kristin Leichner	Pride Recycling Company	President

Comment 4.4: As I mentioned, I appreciate Metro's engagement in the development of this plan, but I believe industry has been left out of consideration and conversation regarding the actual implementation of this plan. The plan indicates a cost of \$194 million to establish 6 depots in the region. Why is there not more focus on partnering with existing sites (transfer stations, recycling facilities, reuse organizations) where possible rather than siting and building multiple new facilities? Metro should model this network of depots off the depot plan within Oregon's Recycling Modernization Act (RMA). The RMA requires the use of existing infrastructure where practicable and the Producer Responsibility Organization (PRO) then provides funding for the services those existing facilities provide for the RMA. Following a similar model for the implementation of this plan would be more cost-effective and could actually result in more depots across the region as there may be multiple facilities in the same region that would be interested in providing these services. My facility in Sherwood already provides an expanded recycling depot and has done so for years. We accepted electronics at our depot long before the Oregon E-Cycles bill was passed, and then continued to do so when E-Cycles was implemented. Our depot takes many more things than can be recycled at the curb including film plastics, small appliances, #1 clamshell plastics, batteries, and more. We are also in discussions to add mattresses to our depot when the Mattress Recycling EPR bill is implemented. Please do not overlook my site and others like it to be partners in this plan.

Response: Metro Council provided direction to staff to invest in facilities that prioritize materials for reuse and recycling to reduce the amount of waste sent to the landfill. Metro Council has expressed a desire to increase Metro's role in providing accessible places for residents and small businesses to take multiple materials for recovery to fill the identified gaps in the existing system. Council supports the creation of a network of publicly owned and

³ Metro (2023). Garbage and Recycling System Facilities Plan: Facility gaps assessment summary report. Available online at: oregonmetro.gov/sites/default/files/2023/08/14/SFP_Technical-Analysis-Summary-Report.pdf.

operated depots as a way to fill this gap and serve households and businesses in the region by providing facilities that are:

1. Accessible – provide excellent customer service, open 6-7 days a week with standard operating hours and affordable
2. Convenient – spread across the region equitably
3. Efficient – accept multiple materials at one location, including materials covered through the Recycling Modernization Act, and able to distribute materials to the best end markets

Metro understands that several private facilities and organizations currently collect a range of recyclable materials, and Metro is interested in partnering with existing sites to achieve the highest recovery rates possible. Metro has added new language to the Community Drop-Off Depot Investment section of the draft Regional System Facilities Plan, outlining potential investment in existing private facilities that are strategically located to complement the proposed Metro-owned drop-off depots. Metro will continue to involve industry and other project partners in the development of this concept during plan implementation.

Entry	Date	Name	Affiliation	Position or connection to project
5	10/23/2024	Beth Vargas-Duncan	Clackamas County Refuse & Recycling Association, Portland Haulers Association, and Washington County Haulers Association	Regional Director

Comment 4.5: Before planning new depots, first reach out and talk with individual solid waste haulers about using existing facilities to enhance the system and limit the number of new drop off sites.

- Providing funding for existing facilities rather than building and siting new ones promotes our common values of reduce & reuse.
- Fewer new drop off depots would reduce
 - overall capital costs estimated at \$194M (in 2024 dollars)
 - annual operations/maintenance costs of \$7.3M for each new depot (some have higher ongoing costs) in addition to the \$273M and
 - costs related to the estimated 15 (new) Metro full-time employees at each depot that may likely increase annually.

Response: See response to comment 4.4. One-stop drop-off locations that accept a range of materials for reuse, recycling and household hazardous waste were identified as a gap in the current garbage and recycling system during phase 2 of the Regional System Facilities Plan project, and Metro Council has clarified that they envision Metro to provide these services in the future.

Entry	Date	Name	Affiliation	Position or connection to project
5	10/23/2024	Beth Vargas-Duncan	Clackamas County Refuse & Recycling Association, Portland Haulers Association, and Washington County Haulers Association	Regional Director

Comment 4.6: Avoid duplication of solid waste services. Enhance, expand, and encourage use of the existing solid waste collection system rather than subsidizing and providing cost incentives for individuals to haul solid waste via many trips using small vehicles and trucks.

Response: See response to comment 4.4. The current collection system is not set up to handle many of the materials that can be recycled and does not provide services for collecting materials for reuse and repair. Metro’s two public transfer stations currently see a high volume of customers making multiple trips to transport materials for disposal using small vehicles and trucks. Metro anticipates that the proposed drop-off depots would help to minimize trips because several items could be brought to one place for recycling and reuse at the same time, rather than requiring customers to drop off materials at different locations across the region.

Entry	Date	Name	Affiliation	Position or connection to project
5	10/23/2024	Beth Vargas-Duncan	Clackamas County Refuse & Recycling Association, Portland Haulers Association, and Washington County Haulers Association	Regional Director

Comment 4.7: Host more collection events for Household Hazardous Waste (HHW) and reuse items in partnership with area non-profit organizations.

Response: Metro is actively working on solutions to increase household hazardous waste collection services to ensure safe, accessible and convenient disposal options for communities across the region. The collection events will continue to be offered in areas across the region that lack access to these services while the community drop-off depot network is developed, and possibly after to supplement areas that may still have long drive times to a permanent facility. However, there are challenges with hosting events including limited availability of host sites and the high price for mobilizing staff and equipment to provide remote collection services safely. Metro’s technical analysis and engagement with local governments shows that additional permanent household hazardous waste facilities would be a more effective long-term solution to meet community needs. For example, local governments and communities in Washington County have been requesting an accessible, permanent, publicly run household hazardous waste facility for several years, given the far drive to Metro Central and Metro South.

Entry	Date	Name	Affiliation	Position or connection to project
8	11/1/2024	Andrew Bartlett	City of Hillsboro	Program Manager

Comment 4.8: Hillsboro generally supports the distributed model of mid-sized facilities that are being proposed and is encouraged to see the westside Cornelius facility as a high priority in this plan. There has been a long-standing gap in services to Hillsboro and Washington County regarding access to Household Hazardous Waste (HHW) disposal and affordable self-haul options which this facility will help to address. Additional services such as the community drop-off depot will also be a benefit to the community. While we are supportive of the expansion of services to the area it will be important to keep the depot facilities focused on their core services to ensure the scope of the facilities meet their primary purpose and avoid added costs which will likely need to be supported by collection rate payers.

Response: Local government solid waste staff and elected officials, community members and other project partners will be able to provide input on the core services to be included at each drop-off depot during plan implementation, and to consider the costs, benefits and tradeoffs of including different services.

Entry	Date	Name	Affiliation	Position or connection to project
8	11/1/2024	Andrew Bartlett	City of Hillsboro	Program Manager

Comment 4.9: Additionally, Hillsboro would encourage Metro to reevaluate the phasing of facility investments to prioritize facilities that address known service gaps (e.g., Cornelius and East Multnomah County). By making investments in these areas first, Metro can review the demand for services at these locations and decide on the level of investments needed at the existing Metro transfer stations or other proposed depots.

Response: If the Regional System Facilities Plan is adopted, the Cornelius depot will be one of the first projects to be implemented. Additionally, Metro has moved the East Multnomah County depot up to Phase 1 to better address the long-standing service gaps identified in this part of the region.

Entry	Date	Name	Affiliation	Position or connection to project
10	11/5/2024	Alaina Labak	Waste-Free Advocates	Vice-President

Comment 4.10: Considerations about access/cost at depots - Can there be an incentive provided to folks who bring materials to the drop off depots so that it would be worthwhile for the neighbor who has a truck or spare time to haul materials for the neighbor who does not, in a similar way to how currently there are folks who pick up scrap metal or cans because there is a small, non-zero payoff to cash in. Perhaps as a code for credit on their garbage utility bill? The amount credited would have to be enough to be worthwhile for someone to drive (up to) 20 miles one way to drop off waste that would otherwise be conveniently picked up right at the driveway by the garbage truck. By linking a dollar value refund (or even a coupon for a discounted purchase or membership to a common good or service like Fred Meyer gasoline) to the materials brought to the depots it helps to fund the community members who fill the access gaps (carless folks or folks in multi-family housing who would not personally benefit from a refund to the garbage fee paid by the whole apartment complex).

Response: Thank you for this suggestion. This is something that could be considered and developed further during plan implementation. Another idea in consideration is to partner with non-profit organizations to coordinate pick-ups for people without cars or who need assistance.

Entry	Date	Name	Affiliation	Position or connection to project
11	11/5/2024	Shannon Martin	City of Gresham	Solid Waste and Sustainability Manager

Comment 4.11: Before planning new self-haul transfer stations, explore all existing facilities to enhance or expand services. In addition, where can we enhance existing collection infrastructure to serve the community in bulky waste collection to reduce the need for six self-haul Metro facilities. Metro has increased rates to help cover the costs of self-haul services at their two transfer stations. Will opening six Metro facilities be cost effective and meet the goal of affordable rates? We agree more services are needed in the western and eastern portions of the region, but the number of sites should have further discussion.

Response: We have added new language to the community drop-off depot investment section of the Regional System Facilities Plan to describe potential investment in existing private facilities that are strategically located, to complement the proposed Metro-owned drop-off depots. The bulky waste collection service currently being planned does not focus on reuse or repair of items, which the drop-off depots will be able to offer. See response to comment 4.4 for more.

The proposed new facilities are intended to fill existing gaps. Metro anticipates that fees at the new facilities will be comparable to fees at the existing Metro transfer stations, recognizing that fees may increase with time to account for growing labor and operation costs. As with existing Metro transfer stations, Metro staff expect that the customer fees at new facilities for services like self-haul disposal of garbage, yard debris and organics will be determined through Metro’s annual budget development process, guided by Metro Council’s fee setting policy and with input from the Regional Waste Advisory Committee and other interested groups. Under current Metro Council guidance and Metro practice, customer fees at Metro solid waste facilities are designed to cover the costs of providing those services.

Entry	Date	Name	Affiliation	Position or connection to project
11	11/5/2024	Shannon Martin	City of Gresham	Solid Waste and Sustainability Manager

Comment 4.12: Gresham would also like to discuss the phase of investment and see an eastside facility as a higher priority than being the last phase of the plan given our diverse population and distance to Metro facilities. By making investments in western and eastern locations, Metro can utilize existing Metro transfer stations while those phases are implemented.

Response: In response to this and other similar comments, Metro staff are proposing changes to the final version of the plan Metro Council will consider for adoption in early 2025 that prioritize investments in community drop-off depots in east Multnomah County. In particular, staff propose to amend the conceptual implementation schedule table on page 59 of the draft plan to show construction of the East Multnomah County depot (described on pages 33-34)

starting toward the beginning of phase 1, and delaying construction of the North Portland depot (described on pages 27-28) until phase 2.

Entry	Date	Name	Affiliation	Position or connection to project
11	11/5/2024	Shannon Martin	City of Gresham	Solid Waste and Sustainability Manager

Comment 4.13: Self-haul investments should focus on HHW and hard to recycle items. We would support additional exploration of utilizing PRO depot sites with rotating days for collection of HHW to increase access of services in one place. More community outreach in the East County is needed to better understand what services are a priority (self-haul or HHW/recycling depots). While we appreciate all the work Metro staff has done on engagement, we feel there has been a gap when it comes to broader community input and has focused on interest groups working with Metro.

Response: Metro would need to assess whether household hazardous waste collection could take place at additional sites to ensure that those sites are equipped to accept and manage hazardous materials safely.

Metro will provide additional opportunities for public input during plan implementation. Community members in East Multnomah County will be able to give feedback on the core services to be included at the proposed drop-off depots, as well as the potential costs, benefits and tradeoffs of including different services.

Entry	Date	Name	Affiliation	Position or connection to project
12	11/6/2024	Donnie Oliveira	City of Portland	Deputy City Administrator

Comment 4.14:

Chapter 4. Investment Strategy

A. Community Drop-off Depots / Self-Haul Sites

The City recommends that the final SFP call for up to four self-haul facilities (North, South, East and West). The first four self-haul facilities for waste, if well-located, will provide the most additional value for the investment. Noting that Seattle transfer was a case study highlighted in the report, establishing four self-haul facilities would be closer to the level of service in Seattle where two transfer stations serve the city with combined commercial and self-haul. We offer this comment for a few other reasons. First, suppose a primary goal in establishing drop-off sites is primarily about increasing access. In that case, we should keep in mind that improved on-route services, as already identified within the Regional Waste Plan, will do more to improve access, and will do so more equitably. Service improvements that drive higher costs should focus on the alternatives that are most equitable and inclusive. We already have significant resources invested in our collection systems and need to maximize those services. Aligned with this is our shared regional goals for transportation, which prioritize increased transportation via walking, biking, and transit, and trip reduction for vehicles. Improved on-route collection services help us avoid pushing public waste systems in a direction that will increase the perception that vehicle ownership is necessary for all. Second, the Draft SFP prioritizes a travel

time of just 20 minutes to self-haul facilities. Given the likelihood that an average resident or small business might rarely, if ever, need to use a drop-off service, we believe that these facilities do not need to be located within 20 minutes of all generators, particularly since they are part of a network of options to drop off a variety of items. The opportunity cost of siting enough facilities to make that possible should be considered.

Response: The investment in six community drop-off depots as proposed in the draft Regional System Facilities Plan stems from Metro Council preferences. At the July 25, 2024 work session, project staff presented two options for depot investments and Metro Council indicated a preference for the option that included six depots instead of three. Since then, Metro has received many comments in support of this approach and others in favor of additional depots to achieve a drive time of less than 20 minutes.

The draft plan does not cite any particular jurisdiction – including Seattle, as the comment notes – as a model or best practice for setting convenience standards or service levels for the region. Convenience standards and service levels for self-haul garbage disposal and recycling facilities vary across the globe. While Seattle has a density of one self-haul facility for every 380,000 people (two facilities for a population of 755,078), the greater Vancouver metropolitan area in British Columbia has at least one municipal facility for every 240,000 people (11 facilities for a population of approximately 2.6 million), and the Recycling Modernization Act is considering having one drop-off location for every 28,000 people (173 collection points for a population of 4.2 million in Oregon).

Entry	Date	Name	Affiliation	Position or connection to project
12	11/6/2024	Donnie Oliveira	City of Portland	Deputy City Administrator

Comment 4.15:

**Chapter 4. Investment Strategy
Facilities Receiving Recycling**

The City supports improving access for recycling and recovery but believe similar questions apply. PPRMA implementation will increase on-route collection of items on the Uniform Statewide Collection List (USCL). Producer Responsibility Organization (PRO) list materials will be accepted at depots at dozens of locations or events throughout the Metro region (locations TBD). More generally, the private sector is required to provide numerous EPR-related collection sites for a variety of materials. Knowing that state law drives private investment in collection and drop-off opportunities, how can we work together to ensure that private dollars will cover the cost of the capital and operational improvements for EPR materials proposed to be collected at Metro sites? How can we minimize cost increases on users, or the Regional System Fee?

Response: Though it is too early to be certain, it appears that many of the Recycling Modernization Act depots will accept one or just a few of the materials on the statewide list of materials accepted for recycling. The proposed community drop-off depots in the draft Regional System Facilities Plan will be able to accept all recyclable materials, as well as other items covered by similar extended producer responsibility programs, such as mattresses, paint and

medical sharps. Metro and the producer responsibility organization for the Recycling Modernization Act are in discussions around compensation at existing transfer stations for recyclable materials. Additionally, Metro and the producer responsibility organization have discussed the potential capital and operational investments available through the Recycling Modernization Act related to the new community drop-off depots proposed in the draft Regional System Facilities Plan. Metro intends to make every effort to minimize cost increases for people who use the garbage and recycling system, including increases to the Regional System Fee.

Entry	Date	Name	Affiliation	Position or connection to project
12	11/6/2024	Donnie Oliveira	City of Portland	Deputy City Administrator

Comment 4.16:

**Chapter 4. Investment Strategy
Facilities Receiving Yard Debris**

A review of the technical gap analysis report suggests that self-haul yard debris options are not a gap in our region. The analysis noted that there are gaps for food waste, yard debris and garbage for the companies that collect on behalf of cities and counties. It may be appropriate to revisit the assumption that self-haul yard debris options are a priority, particularly in comparison to commercial services.

Response: The draft plan does not assume that self-haul yard debris services are a priority relative to commercial services. The technical gap analysis referenced in the comment did not conclude whether self-haul yard debris services are a gap in the region, since the analysis did not include an assessment of facilities that accept yard debris from residential self-haul customers.⁴ This was a decision made to narrow the scope of the analysis to meet the project’s timeline, and the decision was based on the widespread availability of on-route/curbside yard debris collection service offered by cities and counties. All cities and counties within the Metro jurisdictional boundary are required to provide regular, on-route yard debris collection service to single-family households and the service is also widely available in areas outside the boundary. In addition to curbside service, many of the facilities included in the analysis of gaps in facilities that accept yard debris from commercial haulers on pages 30-34 and Table A9 of the technical gap analysis report also accept yard debris from residential and business self-haul customers (including landscaping businesses). The proposed network of six community drop-off depots in the draft plan could increase access to facilities that accept yard debris from residential and business self-haul customers and offer consistent pricing for these services across the region. However, as Chapter 7 describes, each investment project in the plan will go through a process of refinement, design and development prior to being implemented. This process provides an opportunity during plan implementation to determine whether self-haul

⁴ Metro (2023). Garbage and Recycling System Facilities Plan: Facility gaps assessment summary report. Available online at: https://www.oregonmetro.gov/sites/default/files/2023/08/14/SFP_Technical-Analysis-Summary-Report.pdf.

yard debris service does not need to be provided at one or more of the proposed community drop-off depots.

Entry	Date	Name	Affiliation	Position or connection to project
12	11/6/2024	Donnie Oliveira	City of Portland	Deputy City Administrator

Comment 4.17:

Chapter 4. Investment Strategy

Commercial Access to Self-Haul Drop-off Sites

It is important that we clarify what customers, activities, and/or vehicle types these drop-off sites will serve and consider the potential differential impacts on commercial collection services. It may be appropriate to send commercially-collected waste to commercial wet or dry waste or yard debris sites.

Response: The draft Regional System Facilities Plan envisions that the community drop-off depots described on pages 21-34 would serve households and small-business self-haul customers. The facilities would not be designed to accept materials from haulers or other large commercial customers. As outlined in Chapter 7 of the draft plan, additional details for each investment project in the draft plan will be refined during implementation, including potential reassessment of the projected customer base and traffic volumes for new facilities and what materials to collect based on the service area’s needs.

Entry	Date	Name	Affiliation	Position or connection to project
12	11/6/2024	Donnie Oliveira	City of Portland	Deputy City Administrator

Comment 4.18:

Chapter 4. Investment Strategy

Self-haul Drop-off Operational Costs

How were operational cost estimates for a new self-haul site in North or NE Portland derived, and what components would see funding from the private sector?

Response: The annual operations and maintenance costs for the community drop-off depots in the draft Regional System Facilities Plan, including the North and Southeast Portland depots, were developed from different sources by the consultant working on the project (Jacobs). In the case of self-haul disposal services for mixed garbage, yard debris, wood and household hazardous waste, the consultant used cost information from existing Metro facilities. For reuse and recycling operations, the consultant used cost information from Regional Municipality of Peel facilities in Ontario, Canada that focus on providing these services and adjusted for differences in costs with the greater Portland region.

To avoid underestimating costs, the project did not assume any of the drop-off depots would receive funding from grants or private sources – including funding under the Recycling Modernization Act – as these funding sources are uncertain. Metro anticipates some operational costs will be partially or fully offset by the Recycling Modernization Act and other state

extended producer responsibility programs such as Oregon E-Cycles and similar paint and mattress programs. However, those materials account for a small fraction of all materials handled at existing facilities and will likely continue to do so in the future. Hence, any funding provided to cover the cost of handling those materials cannot be expected to cover most or all of the proposed facilities’ operational costs. As stated on page 61 of the draft Regional System Facilities Plan, Metro will also pursue grants wherever possible to offset the costs of new investments.

Entry	Date	Name	Affiliation	Position or connection to project
13	11/6/2024	Amanda Watson	City of Lake Oswego	Sustainability Program Manager

Comment: Improving access to self-haul services is a particular priority for our community. Metro South is currently the closest facility for Lake Oswego residents to dispose of household hazardous waste and self-haul garbage. We support the plan’s proposal to maintain and improve service for self-haul customers at Metro South, and to expand that facility’s capacity to accept more recyclable materials. Lake Oswego residents have told the City that they want more options to dispose of difficult-to-recycle materials in a convenient way. To that end, we would like to see the Regional System Facilities Plan take into consideration investments that will be coming through the Plastic Pollution and Recycling Modernization Act (RMA) for depots that collect certain packaging materials on the statewide recycling acceptance list. While specific details on the locations and types of collection points funded through the RMA have not yet been determined, Metro’s plan should acknowledge the need to take the RMA into account in determining locations and costs for community drop-off depots. Self-haul is most convenient for residents when they can bring multiple materials to one location.

Response: One of the main goals of the community drop-off depots proposed in the draft Regional System Facilities Plan is to increase accessibility for people across the region to bring multiple materials to one drop-off location. The drop-off depots will accept everything included on the Recycling Modernization Act’s statewide list of materials accepted for recycling, as well as other materials included in extended producer responsibility program, such as mattresses, paint and medical sharps. Metro added a new page to the Regional System Facilities Plan to describe the Recycling Modernization Act and how implementing the plan will leverage funding from the Act.

Entry	Date	Name	Affiliation	Position or connection to project
14	11/6/2024	Ryan Largura	City of Troutdale	Environmental Specialist

Comment 4.19: The City thinks Metro plays an important role in the region to fill gaps in services not adequately provided to the public. As shown in Metro’s Facility Gaps Assessment Summary Report (August 2023), east Multnomah County has needs for Facilities that Accept Multiple Recyclable Materials from the Public (Map 6), Commercial Hauler Business Food Waste Facilities (Map 7), Facilities that Accept Household Hazardous Waste from the Public (Map 10), Facilities that Accept Construction materials from the Public (Map 12), and Facilities that Accept Garbage from the Public (Map 13). The City would like to better understand how potential public-private partnerships with existing infrastructure could meet the lack of

services identified by Metro before spending money on new construction. Despite the Plan’s statement on sustainable buildings and sites policy, leveraging existing resources already on the ground rather than building entirely new facilities seems the better, more cost-effective, pathway for sustainability.

Response: See response to comment 4.4.

Chapter 4. Investment Strategy – Reuse and Repair

Entry	Date	Name	Affiliation	Position or connection to project
4	10/22/2024	Kristin Leichner	Pride Recycling Company	President

Comment 4.20: I am supportive of reuse and repair initiatives and think this is important work, but I’m not sure the path that is laid out in this draft plan is the best way to achieve meaningful diversion in the region, nor is it cost-effective. This plan lays out a one-time investment of \$37 million and ongoing costs of \$3.5 million dollars annually and states that this will result in 10,400 tons of waste reduction. In a region that produces 2.6 million tons of waste, if those 10,400 tons are truly diverted, that would result in a diversion rate of 0.4% with a very large price tag. Given the current state of standard retail malls and the shift to online shopping in the United States, I find it difficult to see a reuse mall being utilized enough by the public to justify the cost. I would instead recommend there be more localized and smaller investments in supporting existing reuse organizations and the work that they do in ways that are unique and meaningful to each organization. I also believe there are opportunities for private and public entities to partner with these organizations throughout the region and see how we can all work together to support them by sending customers to them when those customers have usable items to get rid of, providing storage space where available, and in other ways.

Response: Increasing financial support for the reuse and repair sector and partnering with reuse organizations to plan and operate facilities are critical elements of the draft Regional System Facilities Plan (pages 35-40). The draft plan includes a Reuse Impact Fund to provide ongoing, predictable funding to reuse, repair and share organizations and businesses (page 39).

The proposed reuse warehouse and reuse mall investment projects in the draft plan are based on feedback received by Metro staff from engagement with reuse and repair organizations and businesses, as well as feedback provided by the reuse and repair sector to Metro and the City of Portland in previous projects. Both the City of Portland’s 2021 Reuse, Repair and Share Needs Assessment Overview⁵ and Metro’s 2022 Large Item Reuse Study⁶ identified the lack of warehousing space and high cost of accessible retail space as barriers for reuse and repair organizations.

The recovery estimates from the reuse and repair investments in the draft plan (10,400 tons per year) compare favorably against large programs such as the Recycling Modernization Act, which has a proposed target of collecting approximately 7,600 tons of packaging and paper

⁵ Available online at: portland.gov/sites/default/files/2022/overview-2021-bps-scps-reuse-repair-share-needs-assessment.pdf.

⁶ Available online at: oregonmetro.gov/sites/default/files/2023/06/22/2022-Metro-Large-Item-Reuse-Study_0.pdf.

products after developing 173 depots and other collection points across the entire state of Oregon.⁷

There will be opportunity for further consideration of the proposed reuse warehouse and reuse mall projects during plan implementation. Chapter 7 in the draft plan provides more detail on how each proposed investment project will go through a process of refinement, design and development prior to implementation.

Entry	Date	Name	Affiliation	Position or connection to project
5	10/23/2024	Beth Vargas-Duncan	Clackamas County Refuse & Recycling Association, Portland Haulers Association, and Washington County Haulers Association	Regional Director

Comment 4.21: Carefully consider the costs versus benefits of a ‘reuse mall’ to support reuse and repair activities. Analyze whether a mall would be a long lasting investment, as customer usage of conventional malls has notably declined.

Response: There will be opportunity for further consideration of the proposed reuse warehouse and reuse mall projects during plan implementation. Chapter 7 in the draft plan provides more detail on how each proposed investment project will go through a process of refinement, design and development prior to implementation.

Entry	Date	Name	Affiliation	Position or connection to project
7	10/25/2024	None provided	None provided	None provided

Comment 4.22: Recommend that the reuse mall also serves as a reuse drop-off location. Recommend centralizing purchases at the reuse mall so that each organization does not need to staff a register at each shop; centralizing purchases allow for reuse organizations to manage register staffing collectively (thus lowering respective labor costs). Recommend including space at the reuse mall for informal workers to sell their reuse items such as art.

Response: Metro will take these recommendations into consideration during plan implementation, as the details of the proposed reuse mall project are refined. Metro considered having drop-off areas for used items at both the reuse mall and reuse warehouse when developing scenarios during phase 3 of the project and will consider this further during implementation. Metro is also looking at how concepts such as centralized cashier and checkout systems and pop-up retail spaces for new entrepreneurs and artists have been implemented at established reuse facilities, including the Sydhavn recycling center in Denmark, Minimossen

⁷ Pages 61-65 in Circular Action Alliance (2024). Oregon Program Plan (2025 – 2027). Second draft submitted to the Oregon Department of Environmental Quality on September 27, 2024. Available online at: oregon.gov/deg/recycling/Documents/RMA-proplanv2.pdf.

reuse mall in Finland, NochMall reuse mall in Germany and Omigjen reuse shopping center in Norway.

Entry	Date	Name	Affiliation	Position or connection to project
8	11/1/2024	Andrew Bartlett	City of Hillsboro	Program Manager

Comment 4.23: The draft plan includes strong support for the reuse sector and envisions constructing a reuse warehouse and reuse mall at a cost of \$16M and \$21M respectively. There already exists a strong reuse market that does not rely on publicly funded facilities. Before progressing with these facility investments consideration about how the reuse warehouse and mall will be funded should take place to ensure that these facilities can be supported by the tenants of those spaces and that the collection ratepayers are not burdened with the risk of these facilities.

Response: There will be opportunity for further consideration of the proposed reuse warehouse and reuse mall projects during plan implementation. Chapter 7 in the draft plan provides more detail on how each proposed investment project will go through a process of refinement, design and development prior to implementation.

Entry	Date	Name	Affiliation	Position or connection to project
9	11/5/2024	Rick Winterhalter	Clackamas County	Sustainability and Solid Waste Manager

Comment 4.24: Lastly, we support the plan’s direction to expand opportunities for reuse and recovery but are concerned about the significant investment proposed to provide these services. The gap analysis that informed the plan appears to show a significant network of existing conveniently located drop off locations for clothing and household items that can be reused. We believe there needs to be further work to ensure the warehouse, reuse mall and other depots do not simply accept materials that would have already been donated, sold or otherwise reused in some other way without public investment.

As an example, the gap analysis for the collection of e-waste shows a comprehensive and convenient network of drop sites available for this material, illustrating the success of the EPR program for managing this waste stream. There may not be a need to provide resources for the collection of this material at public facilities.

Response: Metro conducted the technical analysis of facility gaps referenced in the comment during phase 2 of the Regional System Facilities Plan project.⁸ The analysis did not include an assessment of facilities that accept clothing or household items for reuse. The analysis did assess facilities that accept electronic devices – either for recycling, reuse or both – and found low gap levels in terms of access, cost and disaster resilience. However, the analysis was not able to distinguish clearly between facilities that accept electronic devices for reuse and those that only accept them for recycling. Additionally, Oregon’s extended producer responsibility program for electronic devices – Oregon E-Cycles – focuses primarily on the safe disposal and

⁸ Metro (2023). Garbage and Recycling System Facilities Plan: Facility gaps assessment summary report. Available online at: oregonmetro.gov/sites/default/files/2023/08/14/SFP_Technical-Analysis-Summary-Report.pdf.

recycling of televisions, computers, monitors and printers. Therefore, there is not sufficient reuse data available and it would be incorrect to assume that the analysis demonstrates the success of Oregon E-Cycles in recovering materials for reuse.

Entry	Date	Name	Affiliation	Position or connection to project
10	11/5/2024	Alaina Labak	Waste-Free Advocates	Vice-President

Comment 4.25: Very excited about the reuse mall!! This would be a huge accomplishment in capturing and redistributing useful goods in the vast category that falls "Between Goodwill and Landfill." I hope that it will include SCRAP as one of the organizations on site collecting donations, since their reuse model redirects so many of the materials that get landfilled because they are not typical thrift store categories.

Response: The draft Regional System Facilities Plan envisions partnering with reuse and repair organizations and businesses to plan and operate the proposed reuse warehouse and reuse mall. The process for selecting tenants for these facilities and the final list of organizations and businesses selected are details that will be developed and finalized during plan implementation.

Entry	Date	Name	Affiliation	Position or connection to project
11	11/5/2024	Shannon Martin	City of Gresham	Solid Waste and Sustainability Manager

Comment 4.26: It is unclear how investment of a reuse mall subsidized by rate payers will increase reuse or be in competition of existing reuse organizations that already serve our community. The proposed reuse commitments need more assessment of alternative approaches and pathways. Will reuse malls capture additional material that would not have been donated, sold or reused? What is the cost per additional unit recovered? What is the risk to rate payers who would be burdened to subsidize these facilities? There is already a strong reuse market and infrastructure that does not rely on publicly funded facilities. We would support further discussion on how future I&I Grant funds can help support reuse and repair within the existing infrastructure.

Response: Increasing financial support for the reuse and repair sector and partnering with reuse organizations to plan and operate facilities are critical elements of the draft Regional System Facilities Plan (pages 35-40). The proposed reuse warehouse and reuse mall investment projects in the draft plan are based on feedback Metro received through engagement with reuse and repair organizations and businesses, as well as feedback provided by the reuse and repair sector to Metro and the City of Portland in previous projects. Both the City of Portland’s 2021 Reuse, Repair and Share Needs Assessment Overview⁹ and Metro’s 2022 Large Item Reuse Study¹⁰ identified the lack of warehousing space and high cost of accessible retail space as barriers for reuse and repair organizations.

⁹ Available online at: portland.gov/sites/default/files/2022/overview-2021-bps-scps-reuse-repair-share-needs-assessment.pdf.

¹⁰ Available online at: oregonmetro.gov/sites/default/files/2023/06/22/2022-Metro-Large-Item-Reuse-Study_0.pdf.

The proposed reuse warehouse and reuse mall are not intended to compete with existing reuse organizations and businesses but rather to support the needs expressed by the reuse and repair sector. Both the reuse warehouse and reuse mall would provide low-cost space to reuse and repair organizations and businesses who would be the tenants and users of these facilities.

There will be opportunity for further consideration of the proposed reuse warehouse and reuse mall projects during plan implementation. Chapter 7 in the draft plan provides more detail on how each proposed investment project will go through a process of refinement, design and development prior to implementation.

Entry	Date	Name	Affiliation	Position or connection to project
12	11/6/2024	Donnie Oliveira	City of Portland	Deputy City Administrator

Comment 4.27: The Draft SFP states that it “lays the foundation to transform a disposal-based system to one that focuses on keeping valuable materials out of the landfill...” (Page 3). The City supports this journey and have been working to identify and support reuse and repair activities for several years. This transformation will take time and collaboration.

Residents need, and in many cases already have, convenient options for placing reusable materials into reuse pipelines. We support investing in the ability to glean reusable items from both on-route collection systems and waste drop-off points, as identified in the Draft SFP and the Regional Waste Plan (Action 8.4). For example, self-hauled loads could first pause at a reuse station upstream of the scale, to evaluate and pull items for reuse before moving on to recycling or disposal areas.

Response: The draft Regional System Facilities Plan envisions that the proposed community drop-off depots (pages 21-34) will have dedicated areas for people to drop off items for reuse and recycling, which will be separate from the area for disposing of mixed garbage, yard debris and other materials for which customers would be charged fees.

Entry	Date	Name	Affiliation	Position or connection to project
12	11/6/2024	Donnie Oliveira	City of Portland	Deputy City Administrator

Comment 4.28: We believe the proposed reuse facilities (mall and warehouse) need further analysis and consideration before adoption as goals of the SFP. A significant amount of material is disposed each year that could potentially be reused, and we support continued efforts towards more reuse including as a strategy to meet needs of low-income residents. We also know that numerous apps, platforms, thrift stores, libraries, and non-profits dispersed around the region are able to support reuse and repair today in meaningful volumes. We are unsure how proposed public facilities will impact the flow of existing reuse systems or how much new or additional reuse will result. We don’t know whether publicly owned reuse infrastructure will repeat the challenges of the confusing hybrid system we use for waste transfer.

Response: Increasing financial support for the reuse and repair sector and partnering with reuse organizations to plan and operate facilities are critical elements of the draft Regional System Facilities Plan (pages 35-40). The proposed reuse warehouse and reuse mall investment

projects in the draft plan are based on feedback Metro received through engagement with reuse and repair organizations and businesses, as well as feedback provided the reuse and repair sector to Metro and the City of Portland in previous projects. Both the City of Portland’s 2021 Reuse, Repair and Share Needs Assessment Overview¹¹ and Metro’s 2022 Large Item Reuse Study¹² identified the lack of warehousing space and high cost of accessible retail space as barriers for reuse and repair organizations.

There will be opportunity for further consideration of the proposed reuse warehouse and reuse mall projects during plan implementation. Chapter 7 in the draft plan provides more detail on how each proposed investment project will go through a process of refinement, design and development prior to implementation.

Entry	Date	Name	Affiliation	Position or connection to project
12	11/6/2024	Donnie Oliveira	City of Portland	Deputy City Administrator

Comment 4.29: Lastly, reconsidering our approach to reuse creates an opportunity to align with Regional Waste Plan Action 8.5. How should we drive more reuse? We do not have the answer, but we suggest revising the Draft SFP to focus on the opportunity for reuse supports shaped by and responsive to local needs through engagement with cities, counties, and reuse organizations. These discussions could build on Metro’s reuse pilot investments, local government initiatives, and community-driven work. For example, we could establish a multi-hub and spoke model using our collection systems or incentives for contractors or haulers to help underwrite collection and dissemination of reuse materials. Perhaps using more housing resources could draw more reuse items towards eligible residents. Materials gleaned from transfer stations could come with a per-item or per-ton recovery incentive to organizations that successfully re-home them and those incentives could be used flexibly including to procure space as needed.

Response: Thank you for your input.

¹¹ Available online at: portland.gov/sites/default/files/2022/overview-2021-bps-scps-reuse-repair-share-needs-assessment.pdf.

¹² Available online at: oregonmetro.gov/sites/default/files/2023/06/22/2022-Metro-Large-Item-Reuse-Study_0.pdf.

Chapter 4. Investment Strategy – Organics

Entry	Date	Name	Affiliation	Position or connection to project
4	10/22/2024	Kristin Leichner	Pride Recycling Company	President

Comment 4.30: This section lays out examples of how Metro may invest in supporting organics diversion. Given the current reload and transfer capacity in the region, it seems most cost-effective to provide one publicly funded depackager for food scraps in the region and not several. The transfer stations could then direct all material from the region to that depackager. Before multiple depackagers are potentially installed, there should first be analysis done on the costs of transfer and transportation to one facility with a depackager vs. multiple depackagers across the region. I am supportive of providing subsidies for food scraps transfer, in line with the subsidy at Metro facilities, at all private transfer stations that take in and transfer this waste. This would provide consistency across the region for this material, regardless of the proximity of each local government to a Metro facility.

Response: Metro will conduct further assessment and analysis to determine if additional depackagers are needed beyond the investment at Metro Central transfer station. Metro will also consider the opportunities and challenges with providing subsidies or other mechanisms to support private transfer stations in the transfer or processing of food scraps.

Entry	Date	Name	Affiliation	Position or connection to project
9	11/5/2024	Rick Winterhalter	Clackamas County	Sustainability and Solid Waste Manager

Comment 4.31: The plan as presented anticipates that Metro Central will be the only location for housing the infrastructure necessary to process commercial food waste. Without providing additional commercial food waste locations it will be important to ensure that access to service payments, currently in place for franchised collectors working in Clackamas County, continue until a food waste processing facility is as conveniently located as Metro South.

Response: See response to comment 4.30.

Entry	Date	Name	Affiliation	Position or connection to project
11	11/5/2024	Shannon Martin	City of Gresham	Solid Waste and Sustainability Manager

Comment 4.32: Gresham supports the expansion of organics transfer utilizing existing infrastructure. With the Business Food Scrap Separation Requirement, we are at the point of needing multiple days of collection per week. Having local transfer would increase route efficiency and reduce greenhouse gas emissions. If Metro decides to not slurry food scraps, mixing commercial food and yard debris should be explored to allow collection route efficiency. One time I&I grants to build additional bays in existing transfer stations would be supported given the long-term benefits.

Response: Thank you for this comment. Metro will take this into consideration and will engage the City of Gresham during the actions outlined in the response to comment 4.30.

Entry	Date	Name	Affiliation	Position or connection to project
12	11/6/2024	Donnie Oliveira	City of Portland	Deputy City Administrator

Comment 4.33: The City recommends organics infrastructure receive greater priority in the Draft SFP and future infrastructure work, along with the topic of commercial transfer. Our organics collection, transfer and processing systems are driving significant costs, particularly in the way that infrastructure interacts (or doesn't) with collection systems. Depackaging capacity is important and should be explored in more detail with collection partners and cities and counties.

On October 7, Metro sponsored a roundtable with cities, counties, and operators of collection systems, transfer stations, and compost facilities. We welcome additional discussion to explore the inter-relationships between collection systems, transfer and processing, policy and operations.

Questions that we'd like to explore include:

- How will themes identified in the roundtable inform the System Facilities Plan or next steps?
- What is the depackaging proportion of the \$30M investment at Metro Central? How replicable do we anticipate depackaging services to be and where will it be sited?
- How can we find ways to address costs in our system and ensure that infrastructure investments align with opportunities to reduce costs?
- Is it worth holding out for processing food waste via wastewater treatment plants?
- How can we ensure that potential public-private partnerships are cost-effective, competitive and transparently procured?

Response: Themes from the Business Food Scraps Recycling roundtable that took place on October 7, 2024 will be reviewed for relevancy for guiding the Regional System Facilities Plan implementation and the assessment described in response 4.30. The depackaging equipment and installation is estimated to cost \$8 million to \$10 million. Metro will look carefully at ways to reduce costs in the system during plan implementation including partnerships; applying for local, state and federal infrastructure grants; and working with local governments. The depackager will allow Metro to create a clean food waste material that can be fed to anaerobic digestion at wastewater treatment plants as well as compost. It is Metro's goal to develop public-private partnerships that benefit the system in as many ways as possible.

Chapter 4. Investment Strategy – Commercial Transfer Stations

Entry	Date	Name	Affiliation	Position or connection to project
12	11/6/2024	Donnie Oliveira	City of Portland	Deputy City Administrator

Comment 4.34: This section of the Draft SFP states that ‘Metro will consider reducing its role in processing and transferring waste from commercial haulers at two transfer stations...’ The City recognizes that Metro Council has posed some important questions that could shape who invests in commercial transfer and how.

Planning and policy for commercial transfer is crucial. We recommend that it be elevated in importance in the Draft SFP and as a focus for regional work. Collection services are the largest share of the typical garbage and recycling bill—and proximity to transfer has an important influence.

Response: Thank you for your comment. Metro’s role in providing commercial transfer services will be determined by the phased approach to siting a commercial transfer station near Metro South (described on pages 45-48) and the outcome of the supporting policy actions outlined in Chapter 5 for managing the flow of wet waste to different facilities as well as the regulation of private facilities.

Entry	Date	Name	Affiliation	Position or connection to project
12	11/6/2024	Donnie Oliveira	City of Portland	Deputy City Administrator

Comment 4.35: Second, in light of Metro Councilors expressing curiosity about stepping back from the commercial transfer, what does this section of the Draft SFP intend to convey about Central? Elsewhere the ‘Organics Hub’ section of the Draft SFP identifies significant investments at Central.

Response: Thank you for your comment. As described on page 43, the draft Regional System Facilities Plan proposes to convert Metro Central transfer station into a facility that serves commercial haulers exclusively once the North Portland community drop-off depot is operational. The draft plan emphasizes that the proposed focus of Metro Central would be to accept residential and commercial organics from haulers. The plan also includes building and equipment upgrades to support operating the facility to focus exclusively on commercial haulers for another two decades. Under this approach, Metro Central would continue to accept the full range of materials it currently accepts from commercial haulers – mixed waste, residential and commercial organics, clean wood and yard debris – unless Metro Council approves changes in the services provided at the facility.

Entry	Date	Name	Affiliation	Position or connection to project
12	11/6/2024	Donnie Oliveira	City of Portland	Deputy City Administrator

Comment 4.36: Third, the Regional Waste Plan calls for Metro (16.1) to ‘Locate garbage transfer stations and allocate material tonnage to them in a way that benefits the public, emphasizing geographic equity, access to service, and a reduction in environmental and human

health impacts.’ While we have more transfer capacity than needed, it isn’t distributed equitably or cost-effectively. Given the volumes of waste handled by the commercial collection system, geographic equity takes on outsized importance for transfer costs, route efficiency, and rate payer equity. We suggest the Draft SFP affirm this.

Response: The technical gap analysis conducted during phase 2 of the Regional System Facilities Plan project found the most significant gaps in access to facilities for commercial haulers to be commercial and residential organics. For mixed garbage – or wet waste – in particular, the analysis found that access gaps are concentrated in areas of Washington County between Hillsboro and Beaverton. To address this gap would require adding a new commercial transfer station or reload facility in that part of the region. Given that the system has more transfer capacity than needed, Metro Council, solid waste industry representatives, and others have expressed a preference for Metro to avoid adding more commercial transfer capacity.

Chapter 5. Supporting Policy Actions

Entry	Date	Name	Affiliation	Position or connection to project
3	10/23/2024	Peter Brandom	City of Cornelius	City Manager

Comment 5.1: Metro MUST regulate fees charged at the private facilities. There is no justification for allowing the facilities to charge fees without regulation.

Response: Thank you for your comment. As part of plan implementation, Metro will explore options to maintain, modify or add regulations to private facilities.

Entry	Date	Name	Affiliation	Position or connection to project
4	10/22/2024	Kristin Leichner	Pride Recycling Company	President

Comment 5.2: I think it is in the best interest of the region for Metro to limit their role in operations for services that private entities can and do provide and instead serve in your role as regulator of these services without being a participant and competitor. In order to truly achieve this, Metro should proceed with the plan to no longer have a role in commercial waste processing.

Response: Thank you for your comment. As part of plan implementation, Metro will evaluate options for modifying or eliminating the current wet waste tonnage allocation and options for reducing or removing the amount of wet waste tonnage that Metro reserves for its public transfer stations.

Entry	Date	Name	Affiliation	Position or connection to project
8	11/1/2024	Andrew Bartlett	City of Hillsboro	Program Manager

Comment 5.3: The draft Regional System Facilities Plan proposes lessening Metro's involvement in commercial wet waste transfer capacity and shifting that service to private transfer stations. Hillsboro and others in the region have long expressed a need for greater transparency of the rates charged at private transfer stations. If Metro does transition away from providing commercial transfer capacity the region will lose a critical cost benchmark to compare private transfer station rates against. If this does occur Metro must increase its oversight of private transfer station rates and require at a minimum rate transparency. The plan's final version should strongly commit to increasing rate transparency to ensure the rates charged at transfer stations are proportionate to the service being provided. If wet waste tonnage shifts to private transfer stations, rates at those stations must be closely monitored and additional levels of rate regulation should be considered. The City has been told that the reason for the higher prices at private transfer stations is due to their tonnage caps and the need to spread fixed costs over fewer tons. If the wet waste tonnage allocation process is modified there needs to be an upfront understanding of what level of rate impact that will have on collection service customers.

Response: Thank you for your comment. As part of plan implementation, Metro will explore options to modify the wet waste tonnage allocation program and options to maintain, modify or add regulations at private facilities. This assessment will consider the implications for the waste management system, access to services for customers and how costs might need to change or be restructured at publicly owned facilities.

Entry	Date	Name	Affiliation	Position or connection to project
9	11/5/2024	Rick Winterhalter	Clackamas County	Sustainability and Solid Waste Manager

Comment 5.4: The plan proposes significant changes for Clackamas County, especially for the Metro South transfer station located in Oregon City. The plan proposes:

- ceasing collection of materials from commercial customers within the next ten years,
- reconfiguring the site for Metro South to become a public only drop off site for small loads of garbage, household hazardous waste materials and provide reuse and recycling opportunities, and
- using private transfer stations to replace the commercial functions of Metro South.

In presenting this proposal the report notes the risks of privatization could include increased costs for commercial customers and possibly a reduction in the types of materials that would be accepted by the privatized station. These risks would be highly impactful to our community and must be mitigated if this approach is to be taken.

Response: Thank you for this comment and for pointing out the concerns with possible changes to Metro South. Metro is aware of these risks and will include Clackamas County in conversations as we move forward.

Entry	Date	Name	Affiliation	Position or connection to project
11	11/5/2024	Shannon Martin	City of Gresham	Solid Waste and Sustainability Manager

Comment 5.5: The City supports further exploration of the two policy-related areas of wet waste tonnage flow and private facility regulation. This must also include a better understanding of Metro’s overhead costs to manage a facility and contract out operations given the Metro tip fee is the standard we look to for private facilities. The plan’s final version should strongly commit to increasing rate transparency to ensure rates are appropriate. If wet waste is distributed to private facilities, rate transparency would help us understand the level of efficiencies for cost savings due to additional tonnage per facility.

Response: See response to comment 5.3.

Entry	Date	Name	Affiliation	Position or connection to project
12	11/6/2024	Donnie Oliveira	City of Portland	Deputy City Administrator

Comment 5.6: In considering the possibility of Metro exiting commercial waste transfer, it will be essential to assess the potential cost impacts of doing so, understand the network and system effects, and also to commit to asserting regulatory authority with respect to fees and services, in what is not a competitive system. In a system with a greater private sector role and increasing vertical integration, it would become more important for us to be able to clearly separate collection, transfer and disposal functions and costs to ensure that a transition like this does not unfairly disadvantage locally owned and smaller operators who are not vertically integrated. Alternatively, as a region we could identify other approaches to ensuring costs for transfer are reasonable and accountable. We are particularly interested in understanding the implications should Metro transfer stations or the waste they receive transition to private facilities.

Response: Thank you for this comment. Metro is aware of these dynamics and risks and will work with City of Portland to consider the implications of increasing the role of private transfer stations in handling wet waste.

Entry	Date	Name	Affiliation	Position or connection to project
13	11/6/2024	Amanda Watson	City of Lake Oswego	Sustainability Program Manager

Comment 5.7: Another important aspect of access to garbage and recycling services is the cost of services. If Metro stops accepting commercial wet waste at its public transfer stations, we would like to see Metro use its authority to regulate rates at private facilities to ensure disposal rates continue to be affordable and serve the public interest.

Response: Thank you for this comment. Metro will consider rate regulation at private facilities as part of the analysis that will begin after plan adoption.

Entry	Date	Name	Affiliation	Position or connection to project
14	11/6/2024	Ryan Largura	City of Troutdale	Environmental Specialist

Comment 5.8: Aside from the investment priorities outlined in the Plan, the City fully supports Metro’s further exploration of the two policy-related areas briefly discussed in the plan, wet waste tonnage flow and private facility regulation. One of the options up for exploration mentioned in the Plan was implementing price controls for private facilities. The City implores Metro Council to act with a greater sense of urgency on this topic. Regulation of private facilities has been floated around for years without action. As costs continue to climb for ratepayers on the collection side, the cost of service at private transfer stations remains a big unknown. In order to better serve the public interest, the City believes transparency is needed at private transfer stations. Local agencies franchise the haulers, and engage in detailed analysis during rate review processes. Haulers, especially vertically integrated haulers that operate their own transfer stations, do not currently provide the transparency in transfer station costs that local agencies like the City need to ensure our rate payers are being charged fair rates. Vertically integrated haulers can set their own rates for themselves at their transfer station(s), claim them

as an operational cost in their rate reviews, and then pass those costs through to the ratepayers without any way for the local agencies to know if those transfer station fees are realistic or fair. Transfer stations are one of the pillars of the solid waste system and to not fully understand the costs associated with them does not make sense and is a disservice to the ratepayers and the local agencies that are charged with providing oversight to ensure those ratepayers are not being gouged. Transparency in transfer station costs is essential, and as the regional solid waste authority, Metro is the only regulating agency able to make that happen.

Response: Thank you for this comment. Metro will consider rate regulation at private facilities as part of the analysis that will begin after plan adoption.

Chapter 6. Cost and Financing Approach

Entry	Date	Name	Affiliation	Position or connection to project
3	10/23/2024	Peter Brandom	City of Cornelius	City Manager

Comment 6.1: References to 'Free' in plan, such as "Free disposal of household hazardous waste" on page 24: please be honest in words that are used. These services will be far from free, and they should not be characterized as such. They cost our communities substantially, and those costs continue to rise largely unabated. The entire plan document should be scrubbed for this and other misleading references.

Response: The use of the term free is consistent with how government agencies refer to services provided at no cost to the public.

Entry	Date	Name	Affiliation	Position or connection to project
4	10/22/2024	Kristin Leichner	Pride Recycling Company	President

Comment 6.2: I have significant concerns over the continued layering of additional costs on the region's ratepayers, especially those costs that are funded through tip fee increases. Most Metro residents do not understand that their garbage bills fund these programs, which puts the burden on haulers and local governments when these additional costs are passed through to those customers. All of us who are a part of the solid waste system have a duty to provide cost-effective and affordable services to our customers (or constituents) and I believe there are more cost-effective ways to achieve many of the goals laid out in this draft plan.

Response: Thank you for your input.

Entry	Date	Name	Affiliation	Position or connection to project
4	10/22/2024	Kristin Leichner	Pride Recycling Company	President

Comment 6.3: My other company, Pride Disposal Company, has collection franchises throughout Washington County. Through these franchises, we are a steward of the communities that we serve and it is our duty to them to provide service that is as efficient and cost-effective as possible. There are many factors that go into local collection rate setting such as labor costs, recycling processing costs, fuel, clean fleet investments, insurance costs, living wages, and much more. But one of the more notable impacts is disposal costs.

While this plan lays out the potential for an up to \$2 increase in collection rates over time, that only speaks to the costs associated with the items within the system facilities plan. That does not include increases associated with other Metro programs within the WPES department such as household hazardous waste, RID patrol, and others. That does not include increases associated with operational cost increases at the transfer stations. All of these factors put upward pressure on collection rates for communities across the Metro region. The total costs of

this draft plan currently total \$273 million. I urge Metro to really dig deep into these details and see how these costs can be minimized.

Response: Chapter 7 in the draft Regional System Facilities Plan describes the implementation and monitoring process, which is designed to provide opportunities to refine cost estimates; explore options for minimizing cost impacts as facilities are planned, designed and built; and monitor the impact of the plan’s investments over time, as other factors put upward pressure on the fees and taxes under Metro’s control.

Entry	Date	Name	Affiliation	Position or connection to project
5	10/23/2024	Beth Vargas-Duncan	Clackamas County Refuse & Recycling Association, Portland Haulers Association, and Washington County Haulers Association	Regional Director

Comment 6.4: We are concerned that the projected \$1.50 to \$2.00 increase in every customer’s garbage bill, through Metro’s Regional System Fee, only covers the estimated \$273M capital investment. If 6 new depots are constructed, Metro will incur added costs onto the entire system beyond the \$273M. **The estimated \$273M in capital does not include Metro’s ongoing costs (\$7.3M) and personnel (15 Metro FTE) for each of the new depots.**

Response: The estimated increase to the garbage and recycling collection bill for the typical single-family household (described on page 62 of the draft Regional System Facilities Plan) includes the additional operations and maintenance costs included in each proposed investment project. To address this and other similar comments, Metro is proposing to add more information about operations and maintenance costs to the final version of the plan.

Entry	Date	Name	Affiliation	Position or connection to project
8	11/1/2024	Andrew Bartlett	City of Hillsboro	Program Manager

Comment 6.5: The plan has a full forecasted cost of \$278M once fully constructed, or \$1.50 - \$2.00 per month per customer. While the monthly forecasted cost may not sound like a large increase in isolation, these costs will be additive to other operational cost drivers for collection services. Because of this, we feel it is important to keep the scale of the facilities in line with needed services. It will also be important to ensure fee-based services (i.e. self-haul, yard debris, and organics) offered at the proposed Community Drop-Off depots are funded by the users of those services and do not rely on subsidization from the regional system fee which will ultimately be paid by collection service customers.

Response: The estimated construction costs for all infrastructure projects in the draft Regional System Facilities Plan are \$273 million in 2024 dollars (described on page 61), not \$278 million.

As noted on page 61 in the draft plan, the cost estimates presented cannot incorporate factors that are outside Metro’s control, such as inflation, future changes in bond market conditions,

and in the programs and services provided by cities and counties that have a major influence on garbage and recycling collection bills for households and businesses.

As with the existing Metro transfer stations, Metro expects that customer fees for self-haul garbage disposal, yard debris and organics services at the new drop-off depots will be determined through Metro’s annual budget development process, guided by the Metro Council fee setting policy and with input from the Regional Waste Advisory Committee and other interested groups. More information about Metro’s budget and solid waste fee setting process, including reports from independent reviews, are available at: oregonmetro.gov/waste-prevention-and-environmental-services-budget-and-solid-waste-fee-setting.

Entry	Date	Name	Affiliation	Position or connection to project
14	11/6/2024	Ryan Largura	City of Troutdale	Environmental Specialist

Comment 6.6: The City of Troutdale (City) appreciates this opportunity to provide comments on Metro’s Regional System Facilities Plan (Plan). The City agrees that the region’s facilities and services should match today’s priorities. However, the City is concerned about the Plan’s ability to keep fees affordable while focusing on investments to improve waste reduction and increase access to services.

It is stated in the Plan that these are high-level cost estimates for early planning and development. The projected indirect \$1.50 to \$2.00 per month increase for the typical single-family household collection bill is no small increase. In recent years, Metro Council has elected to increase the regional system fee and Metro facility fees to better reflect the actual cost of Metro’s transfer station services. Metro fee increases have added pressure on curbside rates already increasing due to labor and transportation cost increases on the collection side for private haulers. The proposed revenue bond payback period of 2025-2045 means the projected \$1.50 to \$2.00 per month increase will not be going away anytime soon. These revenue bonds do not require voters’ approval, which puts greater emphasis on trying to understand costs associated with the Plan before its enactment.

Response: Thank you for your input. Metro is committed to keeping fees affordable while providing essential, equitable services.

Chapter 7. Implementation and Monitoring

Entry	Date	Name	Affiliation	Position or connection to project
9	11/5/2024	Rick Winterhalter	Clackamas County	Sustainability and Solid Waste Manager

Comment 7.1: Overall, we are encouraged to see the broad consideration of options to increase and expand services for Clackamas County but we believe it is critical to seek further outreach and investigation within our community about how they will be best served. Previous efforts to locate land for a commercial disposal site have proven difficult. Any consideration given to this vision will require a robust collaborative engagement with solid waste professionals, local governments and residents from Clackamas County. It is also critical that County franchisees have a publicly rate regulated facility that accepts all materials in order to deliver full and cost-effective services to our residents.

Response: Chapter 7 in the draft Regional System Facilities Plan describes how each investment project in the plan will go through a process of refinement, design and development prior to implementation. This process will include potential reassessment of the projected customer base for new facilities and what materials to collect based on the service area’s needs, and there will be efforts to engage the public, potential host communities, city and county representatives, and other partners (described on page 68). Metro staff are proposing to add more details to incorporate this in Chapter 7 of the plan.

Chapter 5 in the draft plan discusses the supporting policy actions envisioned for assessing private facility regulation including options to maintain, modify or add regulations to private facilities and evaluating the wet waste tonnage allocation process and approach. Examples include requiring private facilities to offer additional services, implementing price controls and removing tonnage allocations (described on page 56).

Entry	Date	Name	Affiliation	Position or connection to project
12	11/6/2024	Donnie Oliveira	City of Portland	Deputy City Administrator

Comment 7.2: This chapter of the plan calls out the possibility that costs will be covered through a combination of Regional System Fee increases and customer fees. As observed above, self-haul services are not accessible to all and may not align well with our regional climate and transportation goals. In considering the values of affordability and access we can consider placing the predominant share, if not the entirety, of the debt service for drop-off costs on user fees rather than the Regional System Fee. This will protect affordability within on-route collection systems, honor the pay-as-you-throw principle, and ensure that costs are not being borne by residents who cannot or do not need to self-haul waste materials.

Response: As with the existing Metro transfer stations, Metro expects that customer fees for self-haul garbage disposal, yard debris and organics services at the new drop-off depots will be determined through Metro’s annual budget development process, guided by the Metro Council fee setting policy and with input from the Regional Waste Advisory Committee and other interested groups. Under current Metro Council guidance and Metro practice, customer fees at Metro solid waste facilities are designed to cover the costs of providing those services. More

information about Metro’s budget and solid waste fee setting process, including reports from independent reviews, are available at: oregonmetro.gov/waste-prevention-and-environmental-services-budget-and-solid-waste-fee-setting.

General comments

Entry	Date	Name	Affiliation	Position or connection to project
1	10/9/2024	Blaine Ackley	None provided	Member of the public

Comment G.1: I don't think that it helps promote waste removal to have a flat rate minimum charge no matter what amount of waste material you bring in to the transfer site.

Response: Currently, the minimum charges for mixed garbage and other materials at the Metro transfer stations apply only to loads up to 240 pounds. For loads that weigh more than 240 pounds, Metro charges a per-ton fee, plus other fees and taxes. The fee-setting process for the proposed Metro reuse, recycling and garbage facilities included in the draft Regional System Facilities Plan will be guided by Metro Council's policies and the annual budget development process.

Entry	Date	Name	Affiliation	Position or connection to project
2	10/10/2024	None provided	None provided	Member of the public

Comment G.2: This is a horrible plan. Please do better.

Response: Thank you for your input.

Entry	Date	Name	Affiliation	Position or connection to project
6	10/25/2024	Elizabeth	None provided	Member of the public

Comment G.3: Please add more services for Beaverton!

Response: The draft Regional System Facilities Plan includes regional reuse and repair facilities and two proposed community drop-off depots that would increase access to reuse, recycling and garbage services for Beaverton residents. See information on the Cornelius and Southeast Washington County community drop-off depots on pages 22-23 and pages 31-32 of the draft plan.

Entry	Date	Name	Affiliation	Position or connection to project
8	11/1/2024	Andrew Bartlett	City of Hillsboro	Program Manager

Comment G.4: Finally, Hillsboro has participated in several engagement opportunities that have helped shape the draft plan, however, we do want to express concern that many of the engagements have been targeted to specific sectors or interest groups. While each of these groups has added value to the draft plan, we feel there has been a gap when it comes to gathering broader community input for what their needs are. We appreciate the engagement efforts that have gone into crafting the draft plan and are optimistic that feedback received through the current public comment period will help strengthen the plan before final adoption.

Response: Metro engaged with city, county and tribal governments, community groups, garbage and recycling businesses, and reuse organizations during each phase of the Regional System Facilities Plan project. In addition to the engagement documented in Chapter 1 of the

draft plan and on the project website, Metro provided the opportunity for the public and interested groups to provide input on the draft plan during the public comment period between Oct. 1 and Nov. 6, 2024.

There will be additional opportunities for engagement during plan implementation, as outlined in Chapter 7 in the draft plan (described on page 68). In response to this and other similar comments, Metro staff are proposing to add more details to Chapter 7 in the final version of the plan that Metro Council will consider for adoption. The additional details will describe more fully how Metro intends to collaborate with city, county, tribal, state, non-profit and private industry partners to implement the plan’s investments, as well as the oversight roles of Metro Council and the Regional Waste Advisory Committee.

Entry	Date	Name	Affiliation	Position or connection to project
9	11/5/2024	Rick Winterhalter	Clackamas County	Sustainability and Solid Waste Manager

Comment G.5: In order to insure that the RSFP is supported by agency partners **Metro must provide an opportunity for the newly reconfigured Regional Waste Advisory Committee to review and provide feedback on the plan prior to adoption.** This group will be responsible for guiding implementation of this plan and fee adjustments. The RSFP proposes large scale changes that will impact the entire region and is estimated to increase household garbage bills by \$1.50 to \$2 monthly. This plan will set a course for future growth and costs. **For these reasons we insist that staff wait to seek adoption until this plan has been vetted by the newly reconfigured Regional Waste Advisory Committee.**

Response: In response to this and other similar comments, the Regional System Facilities Plan project timeline has been extended. Under the new timeline, the Regional Waste Advisory Committee will have an opportunity to review the final plan in early 2025, before Metro Council considers it for adoption. Metro staff are also proposing to add more details to Chapter 7 in the final version of the plan that Metro Council will consider for adoption. The proposed additions will describe more fully how Metro intends to collaborate with city, county, tribal, state, non-profit and private industry partners to implement the plan’s investments, as well as the oversight roles of Metro Council and the Regional Waste Advisory Committee.

Entry	Date	Name	Affiliation	Position or connection to project
12	11/6/2024	Donnie Oliveira	City of Portland	Deputy City Administrator

Comment G.6: I would like to highlight a couple of priority themes for the City of Portland, followed by additional comments organized by corresponding sections of the Draft SFP. First, it is critical that the region plans long-lasting facilities under the assumption of improved on-route collection services called for in the Regional Waste Plan. Our shared values of equitable and inclusive access to the solid waste system should shape our approach to services. For example, better-serving residents of multifamily buildings is a shared priority. These residents and others who may be less likely to own, afford, want, or need a vehicle will gain more access through improved on-route collection services. Let’s invest in targeted ways that protect affordability and access by prioritizing fee increases that will fund the most equitable and

accessible services first—such as on-route bulky item collection. We should also use the Regional System Fee as its name implies, investing more in not only disposal but in supporting collection-related portions of our system. We have significant resources invested in collection systems and should maximize those services.

Second, we agree that some projects identified in Draft SFP deserve further evaluation and analysis to inform a more detailed strategy and subsequent investments, such as for drop-off sites and reuse. We recommend:

- Further considering the number and distribution of self-haul drop-off sites.
- Regional discussions to explore alternative approaches to supporting and reinforcing reuse systems in the area. Exploring less centralized concepts, alignment with existing organizations, targeted funding mechanisms, and options in both collection services and existing infrastructure may offer more value to support reuse and would be better aligned with Regional Waste Plan Action 8.5.
- Elevating the priority of crucial work supporting strategies and infrastructure for organics and commercial transfer.

Response: Thank you for your input. Responses to plan-related portions of this comment are addressed in the chapters where more specific comments were submitted in the same letter.

Entry	Date	Name	Affiliation	Position or connection to project
14	11/6/2024	Ryan Largura	City of Troutdale	Environmental Specialist

Comment G.7: Metro has done a lot of important work creating this plan, but the City thinks more study, analysis and discussion is needed to determine a more cost-effective manner by which to improve waste reduction and increase access to services before committing to the current Plan. With the Plastic Pollution and Recycling Modernization Act soon to be in effect, there remains a great deal of uncertainty in the recycling and solid waste system. Adding cost, albeit uncertain how much, to rate payers in this current environment of system change does not seem like the prudent thing to do.

Response: Further consideration of all proposed investment projects in the draft Regional System Facilities Plan will take place during plan implementation. Chapter 7 in the draft plan describes how each investment project in the plan will go through a process of refinement, design and development prior to being implemented. Prior to initiating each facility or program investment project, a detailed project implementation plan will be prepared. This plan will detail project components, staffing, costs and specific engagement activities.

APPENDIX: PUBLIC COMMENT SUBMISSIONS

Entry	Date	Name	Affiliation	Position or connection to project
1	10/9/2024	Blaine Ackley	None provided	Member of the public

Comment: I don't think that it helps promote waste removal to have a flat rate minimum charge no matter what amount of waste material you bring in to the transfer site.

Entry	Date	Name	Affiliation	Position or connection to project
2	10/10/2024	None provided	None provided	Member of the public

Comment: This is a horrible plan. Please do better.

Entry	Date	Name	Affiliation	Position or connection to project
3	10/23/2024	Peter Brandom	City of Cornelius	City Manager

Comment: On behalf of the City of Cornelius: - References to 'Free' in plan, such as "Free disposal of household hazardous waste" on page 24: please be honest in words that are used. These services will be far from free, and they should not be characterized as such. They cost our communities substantially, and those costs continue to rise largely unabated. The entire plan document should be scrubbed for this and other misleading references. - If a community drop-off is ultimately planned for the Metro parcel in Cornelius, we ask that you please minimize the footprint of the facility to accommodate the need, and dispose of the remaining acreage. This land in our industrial zone is incredibly dear, and can be used for critical, impactful job creating business activity by private industry. Our property tax revenues are 58% comparatively to all Washington County jurisdictions' combined average, and we have no other significant revenue sources at this time. We also have among the highest daily out-migration of employment and highest average commute time in the region, making local job creation a crucial need. - Fees assessed for self haul and other services at these facilities should be much lower than those charged at the private facilities. If needed, these services can be discontinued at private facilities, which can then focus on large waste transfer. - Please define what is meant by "affordable" as stated on page 26 relative to "self-haul disposal services," and elsewhere in the plan. - Metro MUST regulate fees charged at the private facilities. There is no justification for allowing the facilities to charge fees without regulation.

Entry	Date	Name	Affiliation	Position or connection to project
4	10/22/2024	Kristin Leichner	Pride Recycling Company	President

Comment: [Emailed letter included below.]



October 22, 2024

Re: Metro Regional System Facilities Plan Comments

Thank you for the opportunity to comment on the October draft of the Regional System Facilities Plan. I appreciate the steps that Metro staff has taken to engage with stakeholders throughout the development of this plan.

I have significant concerns over the continued layering of additional costs on the region's ratepayers, especially those costs that are funded through tip fee increases. Most Metro residents do not understand that their garbage bills fund these programs, which puts the burden on haulers and local governments when these additional costs are passed through to those customers. All of us who are a part of the solid waste system have a duty to provide cost-effective and affordable services to our customers (or constituents) and I believe there are more cost-effective ways to achieve many of the goals laid out in this draft plan.

Community Drop Off Depots: As I mentioned, I appreciate Metro's engagement in the development of this plan, but I believe industry has been left out of consideration and conversation regarding the actual implementation of this plan. The plan indicates a cost of \$194 million to establish 6 depots in the region. Why is there not more focus on partnering with existing sites (transfer stations, recycling facilities, reuse organizations) where possible rather than siting and building multiple new facilities? Metro should model this network of depots off the depot plan within Oregon's Recycling Modernization Act (RMA). The RMA requires the use of existing infrastructure where practicable and the Producer Responsibility Organization (PRO) then provides funding for the services those existing facilities provide for the RMA. Following a similar model for the implementation of this plan would be more cost-effective and could actually result in more depots across the region as there may be multiple facilities in the same region that would be interested in providing these services. My facility in Sherwood already provides an expanded recycling depot and has done so for years. We accepted electronics at our depot long before the Oregon E-Cycles bill was passed, and then continued to do so when E-Cycles was implemented. Our depot takes many more things than can be recycled at the curb including film plastics, small appliances, #1 clamshell plastics, batteries, and more. We are also in discussions to add mattresses to our depot when the Mattress Recycling EPR bill is implemented. Please do not overlook my site and others like it to be partners in this plan.

Reuse and Repair: I am supportive of reuse and repair initiatives and think this is important work, but I'm not sure the path that is laid out in this draft plan is the best way to achieve meaningful diversion in the region, nor is it cost-effective. This plan lays out a one-time investment of \$37 million and ongoing costs of \$3.5 million dollars annually and states that this will result in 10,400

tons of waste reduction. In a region that produces 2.6 million tons of waste, if those 10,400 tons are truly diverted, that would result in a diversion rate of 0.4% with a very large price tag. Given the current state of standard retail malls and the shift to online shopping in the United States, I find it difficult to see a reuse mall being utilized enough by the public to justify the cost. I would instead recommend there be more localized and smaller investments in supporting existing reuse organizations and the work that they do in ways that are unique and meaningful to each organization. I also believe there are opportunities for private and public entities to partner with these organizations throughout the region and see how we can all work together to support them by sending customers to them when those customers have usable items to get rid of, providing storage space where available, and in other ways.

Organics: This section lays out examples of how Metro may invest in supporting organics diversion. Given the current reload and transfer capacity in the region, it seems most cost-effective to provide one publicly funded depackager for food scraps in the region and not several. The transfer stations could then direct all material from the region to that depackager. Before multiple depackagers are potentially installed, there should first be analysis done on the costs of transfer and transportation to one facility with a depackager vs. multiple depackagers across the region.

I am supportive of providing subsidies for food scraps transfer, in line with the subsidy at Metro facilities, at all private transfer stations that take in and transfer this waste. This would provide consistency across the region for this material, regardless of the proximity of each local government to a Metro facility.

Commercial Wet Waste: I think it is in the best interest of the region for Metro to limit their role in operations for services that private entities can and do provide and instead serve in your role as regulator of these services without being a participant and competitor. In order to truly achieve this, Metro should proceed with the plan to no longer have a role in commercial waste processing.

My other company, Pride Disposal Company, has collection franchises throughout Washington County. Through these franchises, we are a steward of the communities that we serve and it is our duty to them to provide service that is as efficient and cost-effective as possible. There are many factors that go into local collection rate setting such as labor costs, recycling processing costs, fuel, clean fleet investments, insurance costs, living wages, and much more. But one of the more notable impacts is disposal costs.

While this plan lays out the potential for an up to \$2 increase in collection rates over time, that only speaks to the costs associated with the items within the system facilities plan. That does not include increases associated with other Metro programs within the WPES department such as household hazardous waste, RID patrol, and others. That does not include increases associated with operational cost increases at the transfer stations. All of these factors put upward pressure on collection rates for communities across the Metro region. The total costs of this draft plan currently total \$273 million. I urge Metro to really dig deep into these details and see how these costs can be minimized.

Thank you,

Kristin Leichner
President
Pride Recycling Company

Entry	Date	Name	Affiliation	Position or connection to project
5	10/23/2024	Beth Vargas-Duncan	Clackamas County Refuse & Recycling Association, Portland Haulers Association, and Washington County Haulers Association	Regional Director

Comment: [Emailed letter included below.]

October 23, 2024

RE: Metro Regional System Facilities Plan – CCRRA, PHA and WCHA Comments

The solid waste haulers in the metro area including members of Clackamas County Refuse and Recycling Association (CCRRA), the Portland Haulers Association (PHA), and the Washington County Haulers Association (WCHA) submit this letter as our collective comments on Metro's [draft Regional System Facilities Plan](#). We provide services across the solid waste system including hauling, resource recovery, processing, transfer, and landfilling for all areas of Metro's Region. We often work with Metro to advance [Regional Waste Plan](#) goals and values. Along with Metro, local cities, and counties, we are committed to providing solid waste services that are equitable, protect the environment & human health, and provide living wage jobs. We work cooperatively with our regulatory local governments to provide safe, modern, and efficient waste collection services that include garbage, recycling, and organics collection at reasonable rates.

Representing an integral part of the regional solid waste system, we have attended many of Metro's engagements on the Facilities Plan. We appreciate all of the work representatives of Metro, local governments, reuse organizations, community members, and other stakeholders contributed to create the draft Facilities Plan. After careful review of the current draft Facilities Plan, we propose several actions for Metro to close gaps, maximize community benefits, and minimize customer costs.

- Before planning new depots, first reach out and talk with individual solid waste haulers about using existing facilities to enhance the system and limit the number of new drop off sites.
 - Providing funding for existing facilities rather than building and siting new ones promotes our common values of reduce & reuse.
 - Fewer new drop off depots would reduce
 - overall capital costs estimated at \$194M (in 2024 dollars)
 - annual operations/maintenance costs of \$7.3M for each new depot (some have higher ongoing costs) in addition to the \$273M and
 - costs related to the estimated 15 (new) Metro full-time employees at each depot that may likely increase annually.
- Avoid duplication of solid waste services. Enhance, expand, and encourage use of the existing solid waste collection system rather than subsidizing and providing cost incentives for individuals to haul solid waste via many trips using small vehicles and trucks.
- Host more collection events for Household Hazardous Waste (HHW) and reuse items in partnership with area non-profit organizations.
- Carefully consider the costs versus benefits of a 'reuse mall' to support reuse and repair activities. Analyze whether a mall would be a long lasting investment, as customer usage of conventional malls has notably declined.

We are concerned that the projected \$1.50 to \$2.00 increase in every customer's garbage bill, through Metro's Regional System Fee, only covers the estimated \$273M capital investment. If 6 new depots are constructed, Metro will incur added costs onto the entire system beyond the \$273M. **The estimated \$273M in capital does not include Metro's ongoing costs (\$7.3M) and personnel (15 Metro FTE) for each of the new depots.**

We provide these comments to demonstrate our strong commitment to work with Metro, local governments, and others in the community and share our expertise in the industry. Partnering with local government, member haulers have promoted "reduce reuse and recycle" for decades and continue to improve their successful coordinated work reducing overall waste and related negative effects. It is these coordinated efforts among state, regional, local, industry and community members that contribute to Oregon's position as a national leader in recycling and waste management. We look forward to having an opportunity to continue serving as a resource, imparting experiences from our own challenges as large and many small, family and women owned companies, in navigating the business of waste management while promoting our common values.

Sincerely,

Clackamas County Refuse & Recycling Association
Portland Haulers Association and
Washington County Haulers Association

C: Marta McGuire, Director Waste Prevention and Environmental Services, Metro Regional Government

Arrow Sanitary Service/WC
B&B Leasing
Bliss Sanitary Service
City Sanitary Service/WC
Clackamas Garbage Company
Evergreen Disposal Service
Garbarino Disposal & Recycling Services
Gresham Sanitary Service
Heiberg Garbage & Recycling
Hillsboro Garbage Disposal
Kahut Waste Services/ WC
Portland Disposal & Recycling
Pride Disposal Company
Recology-Clackamas
Republic Services
Wacker Sanitary
Walker Garbage Services
WM

Entry	Date	Name	Affiliation	Position or connection to project
6	10/25/2024	Elizabeth	None provided	Member of the public

Comment: Please add more services for Beaverton!

Entry	Date	Name	Affiliation	Position or connection to project
7	10/25/2024	None provided	None provided	None provided

Comment: Recommend that the reuse mall also serves as a reuse drop-off location. Recommend centralizing purchases at the reuse mall so that each organization does not need to staff a register at each shop; centralizing purchases allow for reuse organizations to manage register staffing collectively (thus lowering respective labor costs). Recommend including space at the reuse mall for informal workers to sell their reuse items such as art.

Entry	Date	Name	Affiliation	Position or connection to project
8	11/1/2024	Andrew Bartlett	City of Hillsboro	Program Manager

Comment: The City of Hillsboro appreciates the opportunity to submit public comments regarding the draft Regional System Facilities Plan. The Regional System Facilities Plan is an important document that will help guide investments in the region's solid waste system to address service gaps and ensure equitable access to services throughout the region. While we recognize the draft plan is not intended to provide a comprehensive scope of each proposed facility or completely model the financial impacts of the facilities, we do have some areas of concern that we hope will receive additional consideration as the plan progresses and is implemented. Hillsboro generally supports the distributed model of mid-sized facilities that are being proposed and is encouraged to see the westside Cornelius facility as a high priority in this plan. There has been a long-standing gap in services to Hillsboro and Washington County regarding access to Household Hazardous Waste (HHW) disposal and affordable self-haul options which this facility will help to address. Additional services such as the community drop-off depot will also be a benefit to the community. While we are supportive of the expansion of services to the area it will be important to keep the depot facilities focused on their core services to ensure the scope of the facilities meet their primary purpose and avoid added costs which will likely need to be supported by collection rate payers. Additionally, Hillsboro would encourage Metro to reevaluate the phasing of facility investments to prioritize facilities that address known service gaps (e.g., Cornelius and East Multnomah County). By making investments in these areas first, Metro can review the demand for services at these locations and decide on the level of investments needed at the existing Metro transfer stations or other proposed depots. The plan has a full forecasted cost of \$278M once fully constructed, or \$1.50 - \$2.00 per month per customer. While the monthly forecasted cost may not sound like a large increase in isolation, these costs will be additive to other operational cost drivers for collection services. Because of this, we feel it is important to keep the scale of the facilities in line with needed services. It will also be important to ensure fee-based services (i.e. self-haul, yard debris, and organics) offered at the proposed Community Drop-Off depots are funded by the users of those services and do not rely on subsidization from the regional system fee which will ultimately be paid by collection service customers. The draft Regional System Facilities Plan proposes lessening Metro's involvement in commercial wet waste transfer capacity and shifting that service to private transfer stations. Hillsboro and others in the region have long expressed a need for greater transparency of the rates charged at private transfer stations. If Metro does

transition away from providing commercial transfer capacity the region will lose a critical cost benchmark to compare private transfer station rates against. If this does occur Metro must increase its oversight of private transfer station rates and require at a minimum rate transparency. The plan's final version should strongly commit to increasing rate transparency to ensure the rates charged at transfer stations are proportionate to the service being provided. If wet waste tonnage shifts to private transfer stations, rates at those stations must be closely monitored and additional levels of rate regulation should be considered. The City has been told that the reason for the higher prices at private transfer stations is due to their tonnage caps and the need to spread fixed costs over fewer tons. If the wet waste tonnage allocation process is modified there needs to be an upfront understanding of what level of rate impact that will have on collection service customers. The draft plan includes strong support for the reuse sector and envisions constructing a reuse warehouse and reuse mall at a cost of \$16M and \$21M respectively. There already exists a strong reuse market that does not rely on publicly funded facilities. Before progressing with these facility investments consideration about how the reuse warehouse and mall will be funded should take place to ensure that these facilities can be supported by the tenants of those spaces and that the collection ratepayers are not burdened with the risk of these facilities. Finally, Hillsboro has participated in several engagement opportunities that have helped shape the draft plan, however, we do want to express concern that many of the engagements have been targeted to specific sectors or interest groups. While each of these groups has added value to the draft plan, we feel there has been a gap when it comes to gathering broader community input for what their needs are. We appreciate the engagement efforts that have gone into crafting the draft plan and are optimistic that feedback received through the current public comment period will help strengthen the plan before final adoption.

Entry	Date	Name	Affiliation	Position or connection to project
9	11/5/2024	Rick Winterhalter	Clackamas County	Sustainability and Solid Waste Manager

Comment: [Emailed letter included below.]



DAN JOHNSON
DIRECTOR

DEPARTMENT OF TRANSPORTATION AND DEVELOPMENT
DEVELOPMENT SERVICES BUILDING
150 BEAVERCREEK ROAD OREGON CITY, OR 97045

November 5, 2024

Metro Council
600 NE Grand Ave.
Portland, OR 97232

RE: Draft Regional System Facilities Plan

Dear President Peterson and Metro Councilors,

Thank you for the opportunity to provide comments on the draft Regional System Facilities Plan (RSFP). Developing a community and agency partner supported vision is extremely important. This vision will inform and guide the evolution of our solid waste system, and will provide the vital resources to achieve the goals of the 2030 Regional Waste Plan.

The RSFP is also a critical tool to assess the associated impacting costs to Clackamas County residents who utilize curbside collection and self-haul disposal services. We acknowledge that this is a complex system and we recognize the effort needed to undertake the planning necessary to meet the needs of our community and serve the diverse populations that interact with our regional waste facilities.

In order to insure that the RSFP is supported by agency partners **Metro must provide an opportunity for the newly reconfigured Regional Waste Advisory Committee to review and provide feedback on the plan prior to adoption.** This group will be responsible for guiding implementation of this plan and fee adjustments. The RSFP proposes large scale changes that will impact the entire region and is estimated to increase household garbage bills by \$1.50 to \$2 monthly. This plan will set a course for future growth and costs. **For these reasons we insist that staff wait to seek adoption until this plan has been vetted by the newly reconfigured Regional Waste Advisory Committee.**

The plan proposes significant changes for Clackamas County, especially for the Metro South transfer station located in Oregon City. The plan proposes:

- ceasing collection of materials from commercial customers within the next ten years,
- reconfiguring the site for Metro South to become a public only drop off site for small loads of garbage, household hazardous waste materials and provide reuse and recycling opportunities, and
- using private transfer stations to replace the commercial functions of Metro South.

In presenting this proposal the report notes the risks of privatization could include increased costs for commercial customers and possibly a reduction in the types of materials that would be accepted by the privatized station. These risks would be highly impactful to our community and must be mitigated if this approach is to be taken.

Overall, we are encouraged to see the broad consideration of options to increase and expand services for Clackamas County but we believe it is critical to seek further outreach and investigation within our community about how they will be best served. Previous efforts to locate land for a commercial disposal site have proven difficult. Any consideration given to this vision will require a robust collaborative engagement with solid waste professionals, local governments and residents from Clackamas County. It is also critical that County franchisees have a publicly rate regulated facility that accepts all materials in order to deliver full and cost-effective services to our residents.

The plan as presented anticipates that Metro Central will be the only location for housing the infrastructure necessary to process commercial food waste. Without providing additional commercial food waste locations it will be important to ensure that access to service payments, currently in place for franchised collectors working in Clackamas County, continue until a food waste processing facility is as conveniently located as Metro South.

Lastly, we support the plan's direction to expand opportunities for reuse and recovery but are concerned about the significant investment proposed to provide these services. The gap analysis that informed the plan appears to show a significant network of existing conveniently located drop off locations for clothing and household items that can be reused. We believe there needs to be further work to ensure the warehouse, reuse mall and other depots do not simply accept materials that would have already been donated, sold or otherwise reused in some other way without public investment.

As an example, the gap analysis for the collection of e-waste shows a comprehensive and convenient network of drop sites available for this material, illustrating the success of the EPR program for managing this waste stream. There may not be a need to provide resources for the collection of this material at public facilities.

The Regional System Facilities Plan is an important step in realizing the goals and objectives of the 2030 Regional Waste Plan. Clackamas County is encouraged by the investments proposed, but the success of the plan will rely on meaningful engagement with community members, solid waste professionals, and local governments. We look forward to working together to provide a cost-effective infrastructure to manage materials and protect our environment for the future.

Respectfully submitted,



Rick Winterhalter, Manager
Sustainability & Solid Waste

Entry	Date	Name	Affiliation	Position or connection to project
10	11/5/2024	Alaina Labak	Waste-Free Advocates	Vice-President

Comment: Very excited about the reuse mall!! This would be a huge accomplishment in capturing and redistributing useful goods in the vast category that falls "Between Goodwill and Landfill." I hope that it will include SCRAP as one of the organizations on site collecting donations, since their reuse model redirects so many of the materials that get landfilled because they are not typical thrift store categories. Considerations about access/cost at depots - Can there be an incentive provided to folks who bring materials to the drop off depots so that it would be worthwhile for the neighbor who has a truck or spare time to haul materials for the neighbor who does not, in a similar way to how currently there are folks who pick up scrap metal or cans because there is a small, non-zero payoff to cash in. Perhaps as a code for credit on their garbage utility bill? The amount credited would have to be enough to be worthwhile for someone to drive (up to) 20 miles one way to drop off waste that would otherwise be conveniently picked up right at the driveway by the garbage truck. By linking a dollar value refund (or even a coupon for a discounted purchase or membership to a common good or service like Fred Meyer gasoline) to the materials brought to the depots it helps to fund the community members who fill the access gaps (carless folks or folks in multi-family housing who would not personally benefit from a refund to the garbage fee paid by the whole apartment complex.) Great work to everyone at Metro who have worked so hard on this draft. Thank you for inviting community voices to the project. -Alaina Labak Vice President, Waste-Free Advocates.

Entry	Date	Name	Affiliation	Position or connection to project
11	11/5/2024	Shannon Martin	City of Gresham	Solid Waste and Sustainability Manager

Comment: [Emailed letter included below.]

November 5, 2024

Re: Draft Regional System Facilities Plan

Dear President Peterson and Metro Councilors

The City of Gresham appreciates the opportunity to provide comments on the Draft Regional System Facilities Plan. We appreciate all of the work representatives of Metro and other stakeholders contributed to create the draft Plan.

There are several comments I would like to make to ensure further collaboration on finalizing the Plan.

Before planning new self-haul transfer stations, explore all existing facilities to enhance or expand services. In addition, where can we enhance existing collection infrastructure to serve the community in bulky waste collection to reduce the need for six self-haul Metro facilities. Metro has increased rates to help cover the costs of self-haul services at their two transfer stations. Will opening six Metro facilities be cost effective and meet the goal of affordable rates? We agree more services are needed in the western and eastern portions of the region, but the number of sites should have further discussion. Gresham would also like to discuss the phase of investment and see an eastside facility as a higher priority than being the last phase of the plan given our diverse population and distance to Metro facilities. By making investments in western and eastern locations, Metro can utilize existing Metro transfer stations while those phases are implemented.

Self-haul investments should focus on HHW and hard to recycle items. We would support additional exploration of utilizing PRO depot sites with rotating days for collection of HHW to increase access of services in one place. More community outreach in the East County is needed to better understand what services are a priority (self-haul or HHW/recycling depots). While we appreciate all the work Metro staff has done on engagement, we feel there has been a gap when it comes to broader community input and has focused on interest groups working with Metro.

It is unclear how investment of a reuse mall subsidized by rate payers will increase reuse or be in competition of existing reuse organizations that already serve our community. The proposed reuse commitments need more assessment of alternative approaches and pathways. Will reuse malls capture additional material that would not have been donated, sold or reused? What is the cost per additional unit recovered? What is the risk to rate payers who would be burdened to subsidize these facilities? There is already a strong reuse market and infrastructure that does not rely on publicly funded facilities. We would support further discussion on how future I&I Grant funds can help support reuse and repair within the existing infrastructure.

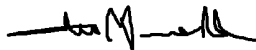


Gresham supports the expansion of organics transfer utilizing existing infrastructure. With the Business Food Scrap Separation Requirement, we are at the point of needing multiple days of collection per week. Having local transfer would increase route efficiency and reduce greenhouse gas emissions. If Metro decides to not slurry food scraps, mixing commercial food and yard debris should be explored to allow collection route efficiency. One time I&I grants to build additional bays in existing transfer stations would be supported given the long-term benefits.

The City supports further exploration of the two policy-related areas of wet waste tonnage flow and private facility regulation. This must also include a better understanding of Metro's overhead costs to manage a facility and contract out operations given the Metro tip fee is the standard we look to for private facilities. The plan's final version should strongly commit to increasing rate transparency to ensure rates are appropriate. If wet waste is distributed to private facilities, rate transparency would help us understand the level of efficiencies for cost savings due to additional tonnage per facility.

Thank you for the opportunity to provide comments. We look forward to additional conversations with Metro, cities, counties and solid waste professionals before a plan is approved by the Council.

Sincerely,



Shannon Martin
Solid Waste & Sustainability Manager
City of Gresham

Entry	Date	Name	Affiliation	Position or connection to project
12	11/6/2024	Donnie Oliveira	City of Portland	Deputy City Administrator

Comment: [Emailed letter included below.]



Community and Economic Development

Donnie Oliveira, Deputy City Administrator

Donald.Oliveira@portlandoregon.gov

1120 SW 5th Ave

Portland, OR 97204

503-593-1869

November 4, 2024

RE: *Comments on the Draft Regional Garbage & Recycling System Facilities Plan (October 1, 2024)*

Dear Metro Councilors:

The City of Portland appreciates the opportunity to comment on the Draft Regional Garbage and Recycling System Facilities Plan (Draft SFP). We also want to recognize the significant work that Metro staff have invested over the past two years in identifying alternative pathways and possibilities.

I would like to highlight a couple of priority themes for the City of Portland, followed by additional comments organized by corresponding sections of the Draft SFP.

First, it is critical that the region plans long-lasting facilities under the assumption of improved on-route collection services called for in the Regional Waste Plan. Our shared values of equitable and inclusive access to the solid waste system should shape our approach to services. For example, better-serving residents of multifamily buildings is a shared priority. These residents and others who may be less likely to own, afford, want, or need a vehicle will gain more access through improved on-route collection services. Let's invest in targeted ways that protect affordability and access by prioritizing fee increases that will fund the most equitable and accessible services first—such as on-route bulky item collection. We should also use the Regional System Fee as its name implies, investing more in not only disposal but in supporting collection-related portions of our system. We have significant resources invested in collection systems and should maximize those services.

Second, we agree that some projects identified in Draft SFP deserve further evaluation and analysis to inform a more detailed strategy and subsequent investments, such as for drop-off sites and reuse. We recommend:

- Further considering the number and distribution of self-haul drop-off sites.
- Regional discussions to explore alternative approaches to supporting and reinforcing reuse systems in the area. Exploring less centralized concepts, alignment with existing organizations, targeted funding mechanisms, and options in both collection services and existing infrastructure may offer more value to support reuse and would be better aligned with Regional Waste Plan Action 8.5.
- Elevating the priority of crucial work supporting strategies and infrastructure for organics and commercial transfer.



Portlandgov



PortlandORGov



@PortlandGov

We thank Metro for this opportunity to comment and believe the Draft SFP could benefit from deeper dialogue with cities and counties around the development of solid waste infrastructure in years to come.

Sincerely,

A handwritten signature in black ink, appearing to read "NO" with a stylized flourish.

Donnie Oliveira
Deputy City Administrator
City of Portland

City of Portland Comments on the Draft Regional Garbage and Recycling System Facilities Plan

Chapter 2. Values and Outcomes

- The City supports more coordination with cities and counties in further infrastructure analyses.
- The City supports municipal and county involvement in the establishment of community benefits agreements identified on Page 10 of the Draft SFP.
- The Draft SFP calls for ancillary spaces such as viewing rooms and displays (page 9) or parks and meeting rooms (page 10). We recommend breaking these out as optional in the Draft SFP and exploring funding them through means other than waste fees.

Chapter 3. Existing System and Gaps

- The City agrees with the assessment that the biggest gaps in addressing Household Hazardous Waste and self-haul options are in Washington County and eastern Portland, Gresham, and Troutdale. We would characterize infrastructure priorities as (1) east-side and west-side access to HHW and residential self-haul of waste, (2) organics, and (3) addressing commercial transfer.
- A gap not currently addressed in the Draft SFP is options for materials containing asbestos and lead paint. Hillsboro is the nearest disposal location serving generators with more than de minimis amounts of untested material or material testing positive. Is it worth examining whether our transfer system can offer greater service in this space?
- The technical gap analysis did not identify self-haul for yard debris as a gap. It may be appropriate to reconsider whether that is a necessary aspect of new self-haul investments.
- The Draft SFP calls for some approaches that break with the Regional Waste Plan (i.e. Actions 16.4, 16.5). We suggest acknowledging and reconciling differences where possible and explaining where Metro believes a change in approach is warranted.

Chapter 4. Investment Strategy

A. Community Drop-off Depots / Self-Haul Sites

Facilities Receiving Waste

The City recommends that the final SFP call for up to four self-haul facilities (North, South, East and West). The first four self-haul facilities for waste, if well-located, will provide the most additional value for the investment. Noting that Seattle transfer was a case study highlighted in the report, establishing four self-haul facilities would be closer to the level of service in Seattle where two transfer stations serve the city with combined commercial and self-haul.

We offer this comment for a few other reasons. First, suppose a primary goal in establishing drop-off sites is primarily about increasing access. In that case, we should keep in mind that improved on-route services, as already identified within the Regional Waste Plan, will do more to improve access, and will do so more equitably. Service improvements that drive higher costs

should focus on the alternatives that are most equitable and inclusive. We already have significant resources invested in our collection systems and need to maximize those services. Aligned with this is our shared regional goals for transportation, which prioritize increased transportation via walking, biking, and transit, and trip reduction for vehicles. Improved on-route collection services help us avoid pushing public waste systems in a direction that will increase the perception that vehicle ownership is necessary for all.

Second, the Draft SFP prioritizes a travel time of just 20 minutes to self-haul facilities. Given the likelihood that an average resident or small business might rarely, if ever, need to use a drop-off service, we believe that these facilities do not need to be located within 20 minutes of all generators, particularly since they are part of a network of options to drop off a variety of items. The opportunity cost of siting enough facilities to make that possible should be considered.

Facilities Receiving Recycling

The City supports improving access for recycling and recovery but believe similar questions apply. PPRMA implementation will increase on-route collection of items on the Uniform Statewide Collection List (USCL). Producer Responsibility Organization (PRO) list materials will be accepted at depots at dozens of locations or events throughout the Metro region (locations TBD). More generally, the private sector is required to provide numerous EPR-related collection sites for a variety of materials. Knowing that state law drives private investment in collection and drop-off opportunities, how can we work together to ensure that private dollars will cover the cost of the capital and operational improvements for EPR materials proposed to be collected at Metro sites? How can we minimize cost increases on users, or the Regional System Fee?

Facilities Receiving Yard Debris

A review of the technical gap analysis report suggests that self-haul yard debris options are not a gap in our region. The analysis noted that there are gaps for food waste, yard debris and garbage for the companies that collect on behalf of cities and counties. It may be appropriate to revisit the assumption that self-haul yard debris options are a priority, particularly in comparison to commercial services.

Commercial Access to Self-Haul Drop-off Sites

It is important that we clarify what customers, activities, and/or vehicle types these drop-off sites will serve and consider the potential differential impacts on commercial collection services. It may be appropriate to send commercially-collected waste to commercial wet or dry waste or yard debris sites.

Self-haul Drop-off Operational Costs

How were operational cost estimates for a new self-haul site in North or NE Portland derived, and what components would see funding from the private sector?

B. Reuse Infrastructure

The Draft SFP states that it “lays the foundation to transform a disposal-based system to one that focuses on keeping valuable materials out of the landfill...” (Page 3). The City supports this journey and have been working to identify and support reuse and repair activities for several years. This transformation will take time and collaboration.

Residents need, and in many cases already have, convenient options for placing reusable materials into reuse pipelines. We support investing in the ability to glean reusable items from both on-route collection systems and waste drop-off points, as identified in the Draft SFP and the Regional Waste Plan (Action 8.4). For example, self-hauled loads could first pause at a reuse station upstream of the scale, to evaluate and pull items for reuse before moving on to recycling or disposal areas.

We believe the proposed reuse facilities (mall and warehouse) need further analysis and consideration before adoption as goals of the SFP. A significant amount of material is disposed each year that could potentially be reused, and we support continued efforts towards more reuse including as a strategy to meet needs of low-income residents. We also know that numerous apps, platforms, thrift stores, libraries, and non-profits dispersed around the region are able to support reuse and repair today in meaningful volumes. We are unsure how proposed public facilities will impact the flow of existing reuse systems or how much *new* or *additional* reuse will result. We don't know whether publicly owned reuse infrastructure will repeat the challenges of the confusing hybrid system we use for waste transfer. Lastly, reconsidering our approach to reuse creates an opportunity to align with Regional Waste Plan Action 8.5.

How should we drive more reuse? We do not have the answer, but we suggest revising the Draft SFP to focus on the opportunity for reuse supports shaped by and responsive to local needs through engagement with cities, counties, and reuse organizations. These discussions could build on Metro's reuse pilot investments, local government initiatives, and community-driven work. For example, we could establish a multi-hub and spoke model using our collection systems or incentives for contractors or haulers to help underwrite collection and dissemination of reuse materials. Perhaps using more housing resources could draw more reuse items towards eligible residents. Materials gleaned from transfer stations could come with a per-item or per-ton recovery incentive to organizations that successfully re-home them and those incentives could be used flexibly including to procure space as needed.

C. Organics Strategy

The City recommends organics infrastructure receive greater priority in the Draft SFP and future infrastructure work, along with the topic of commercial transfer. Our organics collection, transfer and processing systems are driving significant costs, particularly in the way that infrastructure interacts (or doesn't) with collection systems. Depackaging capacity is important and should be explored in more detail with collection partners and cities and counties.

On October 7, Metro sponsored a roundtable with cities, counties, and operators of collection systems, transfer stations, and compost facilities. We welcome additional discussion to explore the inter-relationships between collection systems, transfer and processing, policy and operations.

Questions that we'd like to explore include:

- How will themes identified in the roundtable inform the System Facilities Plan or next steps?
- What is the depackaging proportion of the \$30M investment at Metro Central? How replicable do we anticipate depackaging services to be and where will it be sited?
- How can we find ways to address costs in our system and ensure that infrastructure investments align with opportunities to reduce costs?
- Is it worth holding out for processing food waste via wastewater treatment plants?

- How can we ensure that potential public-private partnerships are cost-effective, competitive and transparently procured?

D. Transfer Station Investments (Commercial Transfer)

This section of the Draft SFP states that ‘Metro will consider reducing its role in processing and transferring waste from commercial haulers at two transfer stations...’ The City recognizes that Metro Council has posed some important questions that could shape who invests in commercial transfer and how.

Planning and policy for commercial transfer is crucial. We recommend that it be elevated in importance in the Draft SFP and as a focus for regional work. Collection services are the largest share of the typical garbage and recycling bill—and proximity to transfer has an important influence.

Second, in light of Metro Councilors expressing curiosity about stepping back from the commercial transfer, what does this section of the Draft SFP intend to convey about Central? Elsewhere the ‘Organics Hub’ section of the Draft SFP identifies significant investments at Central.

Third, the Regional Waste Plan calls for Metro (16.1) to ‘Locate garbage transfer stations and allocate material tonnage to them in a way that benefits the public, **emphasizing geographic equity**, access to service, and a reduction in environmental and human health impacts.’ While we have more transfer capacity than needed, it isn’t distributed equitably or cost-effectively. Given the volumes of waste handled by the commercial collection system, geographic equity takes on outsized importance for transfer costs, route efficiency, and rate payer equity. We suggest the Draft SFP affirm this.

Chapter 5. Supporting Policy Actions

In considering the possibility of Metro exiting commercial waste transfer, it will be essential to assess the potential cost impacts of doing so, understand the network and system effects, and also to commit to asserting regulatory authority with respect to fees and services, in what is not a competitive system. In a system with a greater private sector role and increasing vertical integration, it would become more important for us to be able to clearly separate collection, transfer and disposal functions and costs to ensure that a transition like this does not unfairly disadvantage locally owned and smaller operators who are not vertically integrated.

Alternatively, as a region we could identify other approaches to ensuring costs for transfer are reasonable and accountable. We are particularly interested in understanding the implications should Metro transfer stations or the waste they receive transition to private facilities.

Chapter 6. Phasing, Cost and Financing

This chapter of the plan calls out the possibility that costs will be covered through a combination of Regional System Fee increases and customer fees. As observed above, self-haul services are not accessible to all and may not align well with our regional climate and transportation goals. In considering the values of affordability and access we can consider placing the predominant

share, if not the entirety, of the debt service for drop-off costs on user fees rather than the Regional System Fee. This will protect affordability within on-route collection systems, honor the pay-as-you-throw principle, and ensure that costs are not being borne by residents who cannot or do not need to self-haul waste materials.

In closing, thank you again for the opportunity to offer comment on the Draft System Facilities Plan.

Entry	Date	Name	Affiliation	Position or connection to project
13	11/6/2024	Amanda Watson	City of Lake Oswego	Sustainability Program Manager

Comment: [Emailed letter included below.]



November 6, 2024

Metro
600 NE Grand Ave
Portland, OR 97232

Dear Metro Council:

The City of Lake Oswego appreciates the opportunity to submit written comments on the draft Regional System Facilities Plan. The City of Lake Oswego supports the goals of the Regional System Facilities Plan to increase access to garbage and recycling services and facilities across our region, reduce the amount of materials sent to landfills, and keep services affordable for all customers.

Improving access to self-haul services is a particular priority for our community. Metro South is currently the closest facility for Lake Oswego residents to dispose of household hazardous waste and self-haul garbage. We support the plan's proposal to maintain and improve service for self-haul customers at Metro South, and to expand that facility's capacity to accept more recyclable materials. Lake Oswego residents have told the City that they want more options to dispose of difficult-to-recycle materials in a convenient way. To that end, we would like to see the Regional System Facilities Plan take into consideration investments that will be coming through the Plastic Pollution and Recycling Modernization Act (RMA) for depots that collect certain packaging materials on the statewide recycling acceptance list. While specific details on the locations and types of collection points funded through the RMA have not yet been determined, Metro's plan should acknowledge the need to take the RMA into account in determining locations and costs for community drop-off depots. Self-haul is most convenient for residents when they can bring multiple materials to one location.

Another important aspect of access to garbage and recycling services is the cost of services. If Metro stops accepting commercial wet waste at its public transfer stations, we would like to see Metro use its authority to regulate rates at private facilities to ensure disposal rates continue to be affordable and serve the public interest.

Thank you for your consideration. Please feel free to reach out to me with any questions.

Sincerely,

Amanda Watson
Sustainability Program Manager

Respect. Excellence. Trust. Service.

Entry	Date	Name	Affiliation	Position or connection to project
14	11/6/2024	Ryan Largura	City of Troutdale	Environmental Specialist

Comment: [Emailed letter included below.]



CITY OF TROUTDALE ENGINEERING DIVISION

Sent via Email

November 6, 2024

Metro
600 NE Grand Ave.
Portland, OR 97232-2736
letstalktrash@oregonmetro.gov

Dear Metro,

The City of Troutdale (City) appreciates this opportunity to provide comments on Metro's Regional System Facilities Plan (Plan). The City agrees that the region's facilities and services should match today's priorities. However, the City is concerned about the Plan's ability to keep fees affordable while focusing on investments to improve waste reduction and increase access to services.

It is stated in the Plan that these are high-level cost estimates for early planning and development. The projected indirect \$1.50 to \$2.00 per month increase for the typical single-family household collection bill is no small increase. In recent years, Metro Council has elected to increase the regional system fee and Metro facility fees to better reflect the actual cost of Metro's transfer station services. Metro fee increases have added pressure on curbside rates already increasing due to labor and transportation cost increases on the collection side for private haulers. The proposed revenue bond payback period of 2025-2045 means the projected \$1.50 to \$2.00 per month increase will not be going away anytime soon. These revenue bonds do not require voters' approval, which puts greater emphasis on trying to understand costs associated with the Plan before its enactment.

The City thinks Metro plays an important role in the region to fill gaps in services not adequately provided to the public. As shown in Metro's Facility Gaps Assessment Summary Report (August 2023), east Multnomah County has needs for Facilities that Accept Multiple Recyclable Materials from the Public (Map 6), Commercial Hauler Business Food Waste Facilities (Map 7), Facilities that Accept Household Hazardous Waste from the Public (Map 10), Facilities that Accept Construction materials from the Public (Map 12), and Facilities that Accept Garbage from the Public (Map 13). The City would like to better understand how potential public-private partnerships with existing infrastructure could meet the lack of services identified by Metro before spending money on new construction. Despite the Plan's statement on sustainable buildings and sites policy, leveraging existing resources already on the ground rather than building entirely new facilities seems the better, more cost-effective, pathway for sustainability.



CITY OF TROUTDALE ENGINEERING DIVISION

Aside from the investment priorities outlined in the Plan, the City fully supports Metro's further exploration of the two policy-related areas briefly discussed in the plan, wet waste tonnage flow and private facility regulation. One of the options up for exploration mentioned in the Plan was implementing price controls for private facilities. The City implores Metro Council to act with a greater sense of urgency on this topic. Regulation of private facilities has been floated around for years without action. As costs continue to climb for ratepayers on the collection side, the cost of service at private transfer stations remains a big unknown. In order to better serve the public interest, the City believes transparency is needed at private transfer stations. Local agencies franchise the haulers, and engage in detailed analysis during rate review processes. Haulers, especially vertically integrated haulers that operate their own transfer stations, do not currently provide the transparency in transfer station costs that local agencies like the City need to ensure our rate payers are being charged fair rates. Vertically integrated haulers can set their own rates for themselves at their transfer station(s), claim them as an operational cost in their rate reviews, and then pass those costs through to the ratepayers without any way for the local agencies to know if those transfer station fees are realistic or fair. Transfer stations are one of the pillars of the solid waste system and to not fully understand the costs associated with them does not make sense and is a disservice to the ratepayers and the local agencies that are charged with providing oversight to ensure those ratepayers are not being gouged. Transparency in transfer station costs is essential, and as the regional solid waste authority, Metro is the only regulating agency able to make that happen.

Metro has done a lot of important work creating this plan, but the City thinks more study, analysis and discussion is needed to determine a more cost-effective manner by which to improve waste reduction and increase access to services before committing to the current Plan. With the Plastic Pollution and Recycling Modernization Act soon to be in effect, there remains a great deal of uncertainty in the recycling and solid waste system. Adding cost, albeit uncertain how much, to rate payers in this current environment of system change does not seem like the prudent thing to do.

Please contact me if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink that reads "Ryan Largura". The signature is written in a cursive, flowing style.

Ryan Largura
Environmental Specialist