



600 NE Grand Ave.  
Portland, OR 97232-2736

## Council work session agenda

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**Tuesday, December 17, 2024**

**10:30 AM**

**Metro Regional Center, Council chamber,  
<https://zoom.us/j/615079992> (Webinar ID:  
615079992) or 888-475-4499 (toll free)**

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This meeting will be held electronically and in person at the Metro Regional Center Council Chamber.

You can join the meeting on your computer or other device by using this link:

<https://zoom.us/j/615079992> (Webinar ID: 615 079 992)

### **10:30 Call to Order and Roll Call**

### **10:30 Work Session Topics:**

10:30 Presentation on the Regional System Facilities Plan Draft [24-6174](tel:24-6174)  
and Public Comment Period

Presenter(s): Marta McGuire (she/her), Director of Waste Prevention and  
Environmental Services  
Estee Segal (she/her), Principal Planner  
Luis Sandoval (he/him), Principal Planner

Attachments: [Staff Report](#)  
[Attachment 1](#)  
[Attachment 2](#)

**11:30 Chief Operating Officer Communication**

**11:35 Councilor Communication**

**11:40 Adjourn**

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**Presentation on the Regional System Facilities Plan Draft and  
Public Comment Period**  
*Work Session Topic*

Metro Council Work Session  
Tuesday, December 17, 2024

## WORK SESSION: REGIONAL SYSTEM FACILITIES PLAN – SUMMARY OF INPUT ON DRAFT PLAN

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**Date:** December 2, 2024

**Department:** Waste Prevention and Environmental Services

**Meeting Date:** December 17, 2024

**Presenters:** Marta McGuire, Waste Prevention and Environmental Services Director; Estee Segal, Principal SW Planner; Luis Sandoval, Principal SW Planner

**Length:** 45 minutes

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### ISSUE STATEMENT

Metro is developing a long-range plan for facility and program investments that meet goals to reduce garbage, improve service quality and access, and keep services affordable. The Regional System Facilities Plan project has taken a holistic view of the system to help clarify Metro’s future role in providing facility-based services, including facilities to be built or renovated by Metro or in cooperation with public, private and nonprofit partners. The final plan adoption is proposed for Metro Council consideration in March 2025, after convening the new Regional Waste Advisory Committee. This work session will present a summary of input received on the draft plan during the public comment period conducted this fall, and review the substantive changes made to a revised version of the plan.

### ACTION REQUESTED

Staff seeks direction on incorporating proposed revisions to the draft plan based on input received during the public comment period.

### IDENTIFIED POLICY OUTCOMES

Metro Council identified policy values and outcomes for this project that implement the 2030 Regional Waste Plan values and racial equity principles in May 2022. Council’s three stated priorities for this project are included as outcomes under the values:

- **Waste reduction:** New facilities and programs should focus on reducing waste and the amount of materials that go to landfill.
- **Increased access.:** Improve the quality and access to reuse, recycling and garbage services across the region.
- **Affordability.:** Keep services affordable and cost impacts to residents’ low.

### POLICY QUESTIONS

- 1) Does Council support incorporating the changes recommended by staff into the final draft of the Regional System Facilities Plan?
- 2) Does Council support referring the plan to the Regional Waste Advisory Committee for a recommendation by February 2025?

## STRATEGIC CONTEXT AND FRAMING COUNCIL DISCUSSION

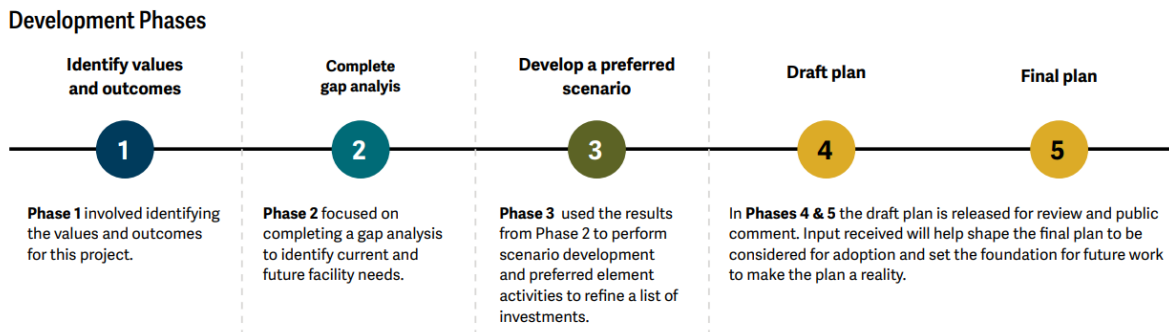
### Project Overview

The Regional System Facilities Plan project has looked at the region’s existing public, private and non-profit garbage, recycling and reuse infrastructure, identified service gaps, and presented potential approaches and a draft plan for future system investments. Specifically, the project has produced over the last two years:

- An overview of the facility-based garbage, recycling and reuse services necessary for achieving the goals of the 2030 Regional Waste Plan.
- The current and anticipated gaps in those services.
- Alternative scenarios for the public, private and non-profit sectors to fill the gaps or mitigate the need to fill them over the next 20 years.
- An implementation plan and financing options for Metro’s role in advancing the plan and building new facilities.

If adopted by Metro Council, the plan will help guide Metro’s future investment in facilities and infrastructure and help to close the gap between those with access to services and those without. The planning process has been structured into five phases and is anticipated to be complete in spring 2025.

### Planning Phases



### Engagement

To develop the draft Regional System Facilities Plan, Metro engaged with tribal, city and county governments, community groups, garbage and recycling businesses and reuse organizations throughout every phase of the plan. Engagement opportunities included meetings, roundtables, workshops and a symposium at which diverse partners identified preferred scenarios for facility investments across the region. Metro also convened a community advisory group to help guide development of the plan. Members were chosen for their unique perspectives and connections to communities as well as their interest and experience in advancing environmental justice.

Since 2022, engagement has included more than 40 meetings with Metro’s advisory committees including twelve meetings with the Regional Waste Advisory Committee, six

meetings with the Metro Policy Advisory Committee, five meetings with the Committee on Racial Equity and 20 meetings with the project’s community advisory group. In addition, staff conducted interviews with private industry and convened roundtables with nonprofit, industry and local governments to inform plan development.

The draft plan was released for public review on October 1, 2024 and public comment was solicited through November 6, 2024. The public comment period provided the opportunity to provide feedback on the plan through an online form, by email or phone and by taking an online survey. In addition, staff conducted local briefings to the groups below to present the draft plan and collect feedback.

<b>Audience</b>	<b>Date</b>
Metro Waste Prevention and Environmental Services update to city managers	9/16/2024
City of Beaverton, City Council	9/17/2024
Metropolitan Mayors’ Consortium	9/26/2024
City of Milwaukie, City Council	10/8/2024
Washington County Coordinating Committee	10/14/2024
City of Beaverton, City Council	10/15/2024
Clackamas County Coordinating Committee	10/16/2024
City of Forest Grove, City Council	10/28/2024
Adelante Mujeres, community conversation in Hillsboro	10/29/2024
City of Lake Oswego, City Council	11/5/2024
Oregon City, City Council	11/6/2024

An engagement summary report will provide an overview of engagement activities completed in Phase 4 of the project and will be presented to Council in early 2025.

**A draft plan public comment report (Attachment 1)** presents all the comments submitted to Metro during the public comment period from Oct. 1 to Nov. 6, 2024, along with corresponding staff responses. Metro received more than 90 comments from individuals and from local government and industry representatives, submitted through an online comment form or by email.

**A revised Final Draft Regional System Facilities Plan (Attachment 2)** incorporates proposed revisions to the plan based on the public comment. The substantive changes made to the plan are summarized in the table below. In addition, some minor copy edits, clarifying language and a few additional pictures were added to the revised plan.

<b>Summary of substantive changes made to the plan</b>
Chapter 3: Existing System and Gaps
Added description and a map of existing facilities that serve the public (self-haul)
Added two new pages with a description of the Recycling Modernization Act and connection to the plan

Chapter 4: Investment Strategy
Revised the community drop-off depot investment strategy to include potential investment in existing privately owned facilities with depots to expand access and capacity through public-private partnerships
Changed the order of depot investments to prioritize the East Multnomah County depot in Phase 1, while moving out the North Portland depot to Phase 2
Added information on the food waste reduction hierarchy to the organic investments introduction
Chapter 6: Phasing, Cost and Financing
Changes to the conceptual phasing and implementation schedule graphics to support the change in order of depot investments, moving East Multnomah County Depot up to Phase 1 and the North Portland Depot back to Phase 2
Added the estimated annual operations and maintenance costs to the overview of investment costs graphic to provide more detail and summarize prior sections
Chapter 7: Implementation and Monitoring
Added a new page with more detail on expected collaboration with partners on project planning and implementation, and the role of the Regional Waste Advisory Committee and Metro Council in advising and overseeing the plan
Added an acknowledgements page at the end

**ATTACHMENTS**

**Attachment 1:** Regional System Facilities Plan Public Comment Report

**Attachment 2:** Final Draft Regional System Facilities Plan



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**



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## **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.<sup>1</sup> 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

<sup>1</sup> 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://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).<sup>2</sup> 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.

<sup>2</sup> 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](https://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 Report<sup>3</sup> 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

<sup>3</sup> 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://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.<sup>4</sup> 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

<sup>4</sup> 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](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 Overview<sup>5</sup> and Metro’s 2022 Large Item Reuse Study<sup>6</sup> 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

<sup>5</sup> Available online at: [portland.gov/sites/default/files/2022/overview-2021-bps-scps-reuse-repair-share-needs-assessment.pdf](https://portland.gov/sites/default/files/2022/overview-2021-bps-scps-reuse-repair-share-needs-assessment.pdf).

<sup>6</sup> Available online at: [oregonmetro.gov/sites/default/files/2023/06/22/2022-Metro-Large-Item-Reuse-Study\\_0.pdf](https://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.<sup>7</sup>

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

<sup>7</sup> 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](https://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.<sup>8</sup> 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

<sup>8</sup> 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://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 Overview<sup>9</sup> and Metro’s 2022 Large Item Reuse Study<sup>10</sup> identified the lack of warehousing space and high cost of accessible retail space as barriers for reuse and repair organizations.

<sup>9</sup> Available online at: [portland.gov/sites/default/files/2022/overview-2021-bps-scps-reuse-repair-share-needs-assessment.pdf](https://portland.gov/sites/default/files/2022/overview-2021-bps-scps-reuse-repair-share-needs-assessment.pdf).

<sup>10</sup> Available online at: [oregonmetro.gov/sites/default/files/2023/06/22/2022-Metro-Large-Item-Reuse-Study\\_0.pdf](https://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 Overview<sup>11</sup> and Metro’s 2022 Large Item Reuse Study<sup>12</sup> 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.

<sup>11</sup> Available online at: [portland.gov/sites/default/files/2022/overview-2021-bps-scps-reuse-repair-share-needs-assessment.pdf](https://portland.gov/sites/default/files/2022/overview-2021-bps-scps-reuse-repair-share-needs-assessment.pdf).

<sup>12</sup> Available online at: [oregonmetro.gov/sites/default/files/2023/06/22/2022-Metro-Large-Item-Reuse-Study\\_0.pdf](https://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](https://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](https://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

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**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.

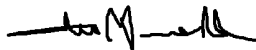
It is unclear how investment of a reuse mall subsidized by rate payers will increase reuse or be in competition of existing reuse organizations that already serve our community. The proposed reuse commitments need more assessment of alternative approaches and pathways. Will reuse malls capture additional 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 5<sup>th</sup> 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.



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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,



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

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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 script is cursive and fluid.

Ryan Largura  
Environmental Specialist

**Regional System Facilities Plan**

**Advancing Waste Reduction,  
Access and Affordability**

Final Draft Plan for Metro Council Review | December 10, 2024



**Metro**

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.

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# TABLE OF CONTENTS



An international panel of experts joined Metro Councilors and leadership at the Reuse, Recycling and Garbage Symposium (September 2023).

# CHAPTER 1: INTRODUCTION





## OVERVIEW

Metro's [2030 Regional Waste Plan](#) created a vision to reduce waste, protect health and the environment, and provide excellent services for everyone. This Regional System Facilities Plan helps implement that vision by identifying the places where people lack services and sets a strategy to invest in modernizing the region's reuse, recycling and garbage infrastructure.

From transfer stations to recycling depots and reuse warehouses, facilities play a key role in managing the things we throw away. The vision of this Regional System Facilities Plan is to focus investments on projects that:

- Improve waste reduction
- Increase access to services
- Keep fees affordable

The draft plan presents a strategy for the next 20 years to allow projects, large and small, to move forward to be further planned or built and identifies areas where more study, analysis and discussion are needed.



### 2030 Regional Waste Plan goals related to this plan:

- **Goal 8:** Increase the reuse, repair and donation of materials and consumer products.
- **Goal 10:** Provide regionally consistent services for garbage, recyclables and other priority materials that meet the needs of all users.
- **Goal 16:** Maintain a system of facilities, from smaller recycling drop-off depots to larger full-service stations, to ensure equitable distribution of and access to services.

During the last 40 years, the garbage, recycling and reuse needs of the region have changed.

Climate change has made it more important to develop places and programs that prevent waste and reduce the amount of greenhouse gases we produce.

It's time to match the facilities and services of the region with today's priorities.

This Regional System Facilities Plan lays the foundation to transform a disposal-based system to one that focuses on keeping valuable materials out of the landfill and supports a circular economy.

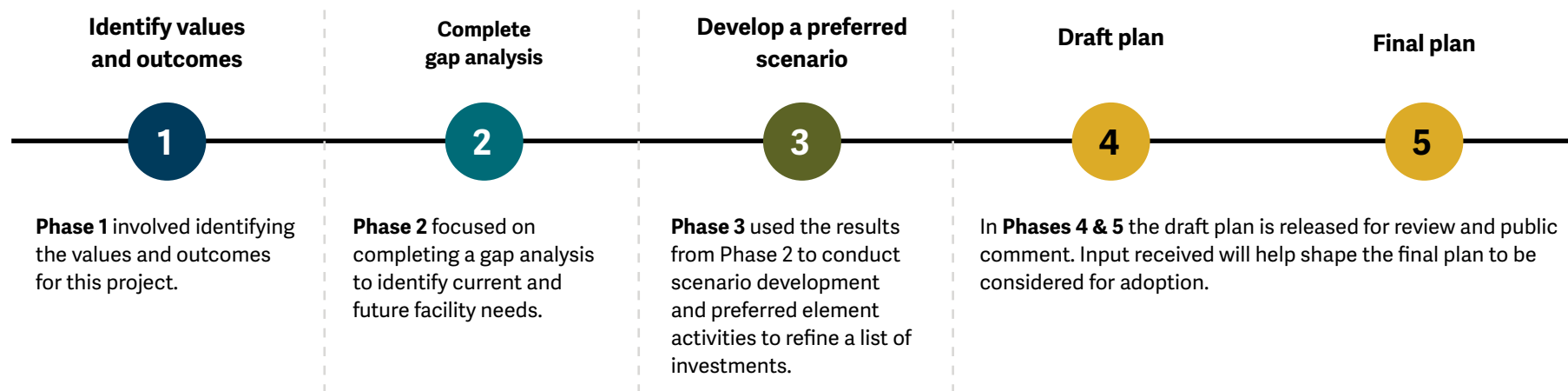


The Metro South facility opened in April 1983 when the region's needs were different from today.

# THE PLANNING PROCESS

In 2022, Metro began the process of collecting information and feedback to prepare the Regional System Facilities Plan. Metro engaged with a diverse array of partners to help set goals, values and outcomes; identify gaps in the current system; envision ways to fill gaps; and narrow options to create the set of investments presented in this plan.

## Development Phases



## MANY VOICES SHAPED THE PLAN

Metro engaged with city, county and tribal governments, community groups, garbage and recycling businesses and reuse organizations throughout every phase of this Regional System Facilities Plan.

Engagement opportunities included meetings, roundtables, workshops and a symposium at which diverse partners identified preferred scenarios for facility investments across the region.

Metro also convened a community advisory group to help guide development of the plan. Members were chosen for their unique perspectives and connections to underserved communities, as well as their interest and experience in advancing environmental justice.



Community Advisory Group members look over an early draft of the Regional System Facilities draft plan.

# ENGAGEMENT DURING PLAN DEVELOPMENT

2022	2023	2024
<p><b>September</b> Metropolitan Mayors Consortium</p> <p><b>October</b> Roundtables with:  <ul style="list-style-type: none"> <li>Reuse and repair leaders</li> <li>Local government staff</li> <li>Private industry partners</li> </ul> </p> <p><b>Ongoing meetings with:</b>                      Community Advisory Group (8)                      Regional Waste Advisory Committee (2)                      Committee on Racial Equity (2)                      Metro Policy Advisory Committee (1)</p>	<p><b>March</b> Reuse and repair workshop</p> <p><b>May</b> 12 interviews with garbage and recycling industry partners</p> <p><b>September</b> International Panel &amp; Symposium (120 attendees)</p> <p><b>November</b> Metropolitan Mayors Consortium</p> <p><b>Ongoing meetings with:</b>                      Community Advisory Group (8)                      Regional Waste Advisory Committee (5)                      Committee on Racial Equity (2)                      Metro Policy Advisory Committee (1)                      Local government roundtable (2)</p>	<p><b>January</b> Confederated Tribes of Siletz Indians Portland Area Office                      Adelante Mujeres workshop                      Unite Oregon workshop</p> <p><b>September</b> Reuse roundtable                      Metropolitan Mayors Consortium</p> <p><b>October</b> Industry partners roundtable                      Metropolitan Mayors Consortium                      Washington County Coordinating Committee                      Clackamas County Coordinating Committee                      Local government presentations (6)</p> <p><b>November</b> Adelante Mujeres workshop</p> <p><b>Ongoing meetings with:</b>                      Community Advisory Group (4)                      Regional Waste Advisory Committee (2)                      Committee on Racial Equity (1)                      Metro Policy Advisory Committee (2)                      Local government roundtable (2)</p>

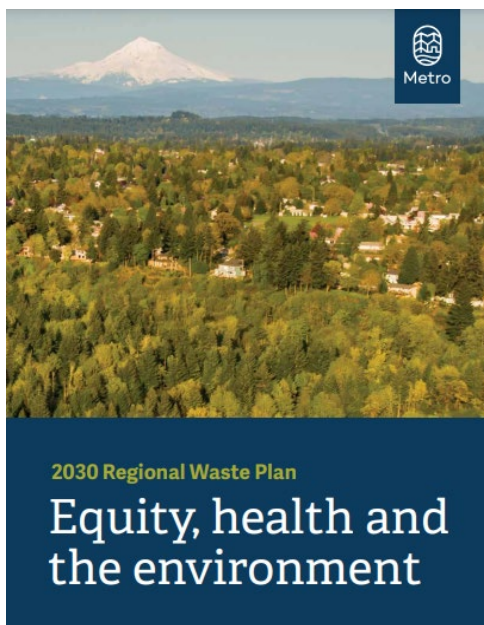




# CHAPTER 2:

## VALUES AND OUTCOMES

# VALUES AND OUTCOMES



## What guides this plan?

The 2030 Regional Waste Plan is a far-reaching blueprint for how our region manages the impacts of the products we buy, use and throw away.

The values and principles of the 2030 Regional Waste Plan were foundational to the development of values for this Regional System Facilities Plan. The Regional System Facilities Plan also includes Metro’s commitment to seek tribal government consultation.

The values and outcomes were further shaped with input from community and industry partners, a community advisory group and Metro Council.

Together, the values and outcomes guided the engagement and outreach approach and the evaluation of service gaps and investment options. They steered the development of the investment strategy that is included in this plan. They will be used to measure the overall success of the plan during the next 20 years.

While all the values and outcomes will be important to the implementation of this plan for the next 20 years, three of them provided focus areas for the plan development and identification of investment priorities:



**Resource conservation:** reducing waste through infrastructure improvements



**Excellent service:** equitable system access, improved quality and access to services through new infrastructure



**Operational resilience:** keeping services affordable

## Investments to reduce waste

This plan outlines the infrastructure investments necessary to help the region reuse, repair and recycle more materials to reduce the negative health and environmental impacts of waste and support the transition to a more circular economy. New facilities will help the region recover more waste through recycling, composting or energy recovery, instead of sending it to the landfill.

Reusing and repairing materials has even greater benefits by avoiding the negative impacts from landfilling and reducing the need to manufacture new products, which requires the use of valuable raw materials, resources and energy to mine/extract those materials, make new products and transport them.





### Healthy people and environment

- Minimize the negative health and environmental impacts of facilities by incorporating innovative sustainability practices as outlined in Metro's green building policy.
- Develop good neighbor agreements between communities and facilities.



### Resource conservation (waste reduction)

- Identify the items the plan needs to target for reuse, repair, recycling or composting –and the infrastructure needed to manage them.
- Increase access to donate and buy used items.
- Provide workspace, reclaimed materials and other types of support to regional reuse and repair initiatives.



### Environmental literacy

- Provide learning opportunities at facilities through tours, displays, exhibits and viewing rooms.
- Develop programming with organizations focused on waste prevention and environmental justice.



### Economic well-being

- Provide jobs with living wages, benefits and safe work environments.
- Recruit and retain workers who are underrepresented in the garbage and recycling industry.
- Create opportunities within the garbage, recycling, reuse and repair sectors for people with barriers to employment.



### Excellent service and equitable system access

- Develop a network of facilities to provide equitable system access.
- Establish direction for Metro transfer stations and Metro solid waste facilities.
- Keep facility-based services affordable for low-income customers.
- Make public facilities accessible for people with disabilities and people who rely on transit.
- Develop multilingual and culturally relevant communication tools for facilities.



Learn more about the  
[Values and Outcomes](#)



Community Advisory Group: Tour of Metro South household hazardous waste facility (March 2023).





**Operational resilience, adaptability and sustainability**

- Develop funding options that advance waste reduction and affordability goals.
- Design efficient facilities to serve people quickly and recover useful materials.
- Identify facility investment needs for natural hazard resilience.
- Shape garbage and recycling systems with key elements from regional transportation and land use planning efforts.



**Community restoration**

- Evaluate potential facility benefits and burdens using a climate justice lens.
- Incorporate the needs of marginalized communities in the planning process.



**Community partnerships**

- Create a community advisory group that works with staff to develop the plan.
- Involve community-based organizations in decision-making about facility projects.
- Partner with Black, Indigenous, and People of Color communities and immigrant-led organizations to support reuse and repair projects at new facilities.



**Community investment**

- Develop Community Benefits Agreements to ensure benefits are equitably shared and address community needs.
- Provide community gathering spaces such as parks and meeting rooms at public facilities that serve residential customers.



**Tribal consultation**

- Seek to consult with tribal governments to advance shared priorities such as cultural and historic resource protection, environmental protection and resource conservation.
- Establish partnerships with Tribes through government-to-government engagement.



Scenarios workshop with community members at Adelante Mujeres in Forest Grove (January 2024).



# CHAPTER 3: EXISTING SYSTEM AND GAPS

# EXISTING METRO FACILITIES OVERVIEW

The existing regional reuse, recycling and garbage system is operated by a mix of public, private and nonprofit parties, and is known as a “hybrid system.” Metro currently operates five facilities that help manage waste in the region.



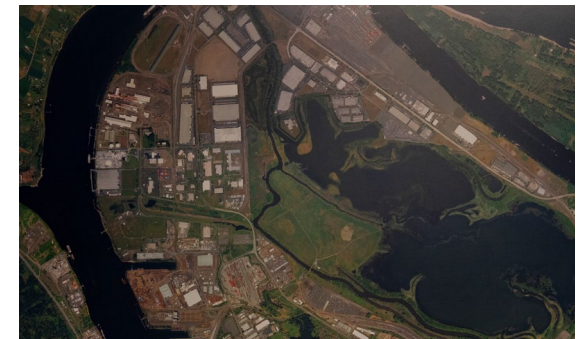
**Metro Central and Metro South** – Currently, these two public transfer stations accept garbage, yard debris, food waste, household hazardous waste and some materials for recycling. Both facilities face site challenges, offer limited recycling and do not have reuse drop-off options for the public.



**RID Deployment Center** – Metro’s Regional Illegal Dumping (RID) Patrol tackles the problem of dumped garbage on public property and provides other cleanup services.



**MetroPaint** – This leased facility on Swan Island recycles used paint into new paint that is sold through a retail storefront and distributed to other retailers.



**St. Johns Landfill** – This site served as the region’s primary garbage disposal site for 50 years. Since completing the final landfill cover system in 1996, Metro has spent nearly \$20 million on landfill post-closure care and is obligated to continue managing this facility. This facility is not impacted by this plan.

## EXISTING REGIONAL FACILITIES OVERVIEW

The hybrid system includes facilities that collect a mix of materials and are an important element of the regional transfer sector. The transfer sector refers to places where materials are collected and consolidated into larger loads for transporting to facilities that process those materials for reuse, recycling, composting, landfilling or energy recovery. These facilities accept materials from residents and small businesses, commonly referred to as “self-haul” customers, but there are also many other facilities such as transfer stations and material recovery facilities that accept materials from haulers and other commercial customers. The types of materials collected can be categorized in three broad categories: mixed garbage, dry waste, or recycling.

### Mixed Garbage from the Public

Facilities that receive mixed garbage from the public are often called self-haul transfer stations because they serve customers who haul their own waste and consolidate such waste in large trucks before transferring to landfills.

### Dry Waste from the Public

These facilities accept dry waste materials from individuals, businesses or institutions. Types of dry waste include:

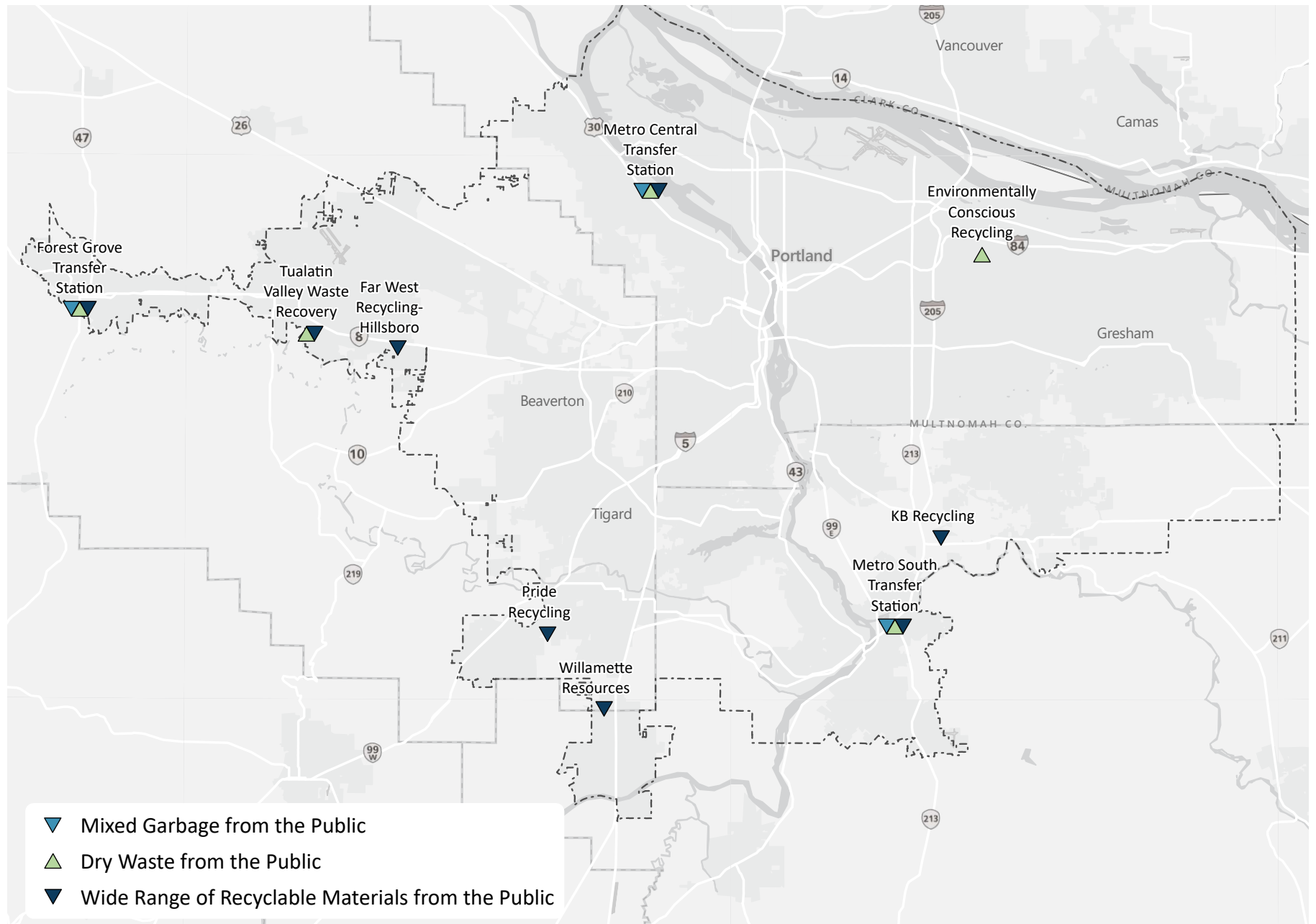
- Mixed waste from home repair projects brought in by homeowners
- Asphalt shingles from roofing jobs hauled by contractors
- Separated wood, metal, concrete and drywall from construction projects brought in by contractors

The dry waste materials accepted from the public by these facilities are either separated for recycling, are burned for energy recovery in the case of most clean wood or are transported to a landfill.

### Recyclable Materials from the Public

These facilities are often called “recycling depots” and have separate bins for people to place materials for recycling. Often these are materials that are not accepted through on-route collection but can be recycled. Recycling depots tend to be located inside or adjacent to garbage and recycling facilities. Although there are many places in the region that accept recyclable materials from residents, only a few provide one-stop locations where people can take multiple types of materials such as metal, appliances, tires, glass, cardboard, batteries and paint.

Facility	Mixed Garbage from the Public	Dry Waste from the Public	Wide Range of Recyclable Materials from the Public
<b>Metro Central</b>	x	x	x
<b>Metro South</b>	x	x	x
<b>Environmentally Conscious Recycling</b>		x	
<b>Far West Recycling Hillsboro</b>			x
<b>Forest Grove Transfer Station</b>	x	x	x
<b>KB Recycling</b>			x
<b>Pride Recycling</b>			x
<b>Tualatin Valley Waste Recovery</b>		x	x
<b>Willamette Resources</b>			x



## GAP ANALYSIS

Metro used engagement activities and technical research to identify facility-related gaps. Outreach included meetings, roundtables, workshops and a symposium. Metro engaged with historically marginalized communities, reuse and repair business leaders, local government and private industry. The resulting analysis showed significant gaps in the region's reuse, recycling and garbage facilities and other waste-related services. Some of the key gaps found include:

- In certain parts of the region, such as Washington County and east Multnomah County, residential and small business customers lack a convenient way to drop off recyclables, household hazardous waste, garbage, and large household items that could be reused. And there are significant differences in the prices people must pay for dropping off certain materials depending on where they are located within the region.
- For the companies that collect garbage and recycling on behalf of cities and counties, there are facility gaps, particularly in terms of access and cost differences for food waste, yard debris and garbage.
- Reuse and repair organizations told Metro they need more warehouse and flexible space to sort, repair and store items, and that they need more consistent funding to increase their collection and distribution of used items.

A [technical analysis summary report](#) details the gaps that were identified through engagement and research.







## USING GAPS TO DEVELOP SCENARIOS

Findings from the gap analysis and lessons from communities around the world inspired scenarios to create facilities and services that could address gaps in our region. These scenarios considered different tools Metro could use to address gaps, including:

- Building new Metro facilities and renovating existing ones:** Metro could build new facilities and/or renovate its existing transfer stations to address specific facility gaps in different parts of the region.
- Direct investments in private and nonprofit facilities:** Metro could provide funding to businesses and nonprofits to increase the collection of items for reuse and recycling using their own facilities, equipment and methods.

- Policies and programs:** Metro could implement a range of options such as increasing requirements on private garbage and recycling facilities and/or city and county collection programs. Metro could also create programs to encourage – rather than require – cities, counties and private facilities to expand services.

Metro engaged a variety of partners to collect information that was used to develop and refine the scenarios. The four scenarios that were developed were referred to as Baseline, Full-Service, Distributed, and No-Build. A high-level description of each scenario is shown in the graphic on this page and more details can be found in the [symposium discussion guide](#).

Baseline	Full-Service	Distributed	No-Build
			
Metro does not build new facilities or address facility gaps, but maintains current facilities	Metro builds four large transfer stations and two new reuse facilities	Metro builds a network of distributed mid-sized facilities across the three counties	Metro increases requirements, invests in private facilities and renovates existing facilities

## LESSONS FROM AROUND THE WORLD

In addition to taking a holistic approach to address regional waste challenges, Metro looked for inspiration in other states and countries. This research and outreach highlighted how communities around the world are shifting away from the materials management approach that focuses largely on end-of-life processes, such as disposal, to a life cycle or circular economy approach. In this approach, it is essential

to have facilities that are better equipped to capture repairable and reusable materials with space to receive and sort materials for reuse, recycling and composting. The following examples showcase facilities in four jurisdictions represented at the reuse, recycling and garbage system symposium held in September 2023 at the Oregon Convention Center.



Recycle Row is a mile-long stretch in Boulder, Colorado, where five clustered Zero Waste facilities are located, including Eco-Cycle's Center For Hard-to-Recycle Materials (CHaRM) and Resource Central's materials reuse yard.

*Photo credit: Photo courtesy of the Eco-Cycle Center for Hard-to-Recycle Materials*



Residents of Eskilstuna, Sweden can take reusable items to a warehouse that sources materials for businesses to turn into items to be sold at the ReTuna reuse mall next door.

*Photo credit: Courtesy of ReTuna Återbruksgalleria, Eskilstuna, Sweden.*





The United Boulevard Recycling and Waste Centre in Vancouver, British Columbia is a one-stop drop for recyclables, including extended producer responsibility items.

*Photo credit: Courtesy of Metro Vancouver, British Columbia.*



The Resource Recovery Network in Auckland, New Zealand is made up of 13 community recycling centres, distributed throughout the region.

*Photo credit: Courtesy of Auckland Council, New Zealand.*

# SCENARIOS SHARED AT SYMPOSIUM

After the four scenarios were developed, they were presented in September 2023 at a symposium that included 120 partners to gather feedback from multiple audiences. A discussion guide provided detailed information about the scenarios and the need for this plan. Participants were asked to evaluate the scenarios, giving their pros and cons about each, and to choose which scenario, or which elements of each, they preferred.

Additional engagement following the symposium was conducted to continue discussing the scenarios with local government, industry and community partners.

An [Engagement report](#) summarizes what was heard and learned at the symposium and over the first three project phases.



Partners were engaged to build and review scenarios at the symposium.

1

## Building Scenarios

- Reuse/repair workshop
- Local government solid waste directors
- Industry interviews
- International panel at Council
- Committee feedback

2

## Symposium

- Over 120 participants, including representatives from:
- Community
  - Local government
  - Reuse/repair
  - Industry

3

## Follow Up

- Metropolitan Mayors’ Consortium
- Local government workshops
- Waste Prevention and Environmental Services staff
- Unite & Adelante Mujeres workshops
- Confederated Tribes of Siletz Indians Portland Area Office workshop

*“We have a big task ahead as we care for and respond to the garbage and recycling needs of our changing community.”*

*Metro COO Marissa Madrigal*

# ENGAGEMENT-DEFINED INVESTMENT PRIORITIES

Input received during and following the symposium indicated a preference for the Distributed scenario and for some elements of the Full-Service and No-Build scenarios. Participants supported separating commercial facilities and public facilities, focusing on reuse and recycling, and establishing a regional reuse warehouse and a reuse mall. Investment priorities included supporting existing garbage and recycling infrastructure, improving safety at existing Metro facilities, providing stable funding, and keeping costs affordable.

These supported elements were then used to develop a list of investment priorities that were further explored with Metro Council in spring 2024 to inform an investment strategy.

## Supported Elements:

### Facilities

-  Separate commercial facilities and public facilities
-  Public facilities, including reuse and recycling centers
-  New reuse mall and warehouse concept

### Investment priorities

- Existing public, private and nonprofit infrastructure
- Improving safety and reuse at Metro Central and Metro South
- Stable funding for reuse infrastructure
- Invest in facilities but keep costs down

## CONNECTION TO THE PLASTIC POLLUTION AND RECYCLING MODERNIZATION ACT

With passage of the Plastic Pollution and Recycling Modernization Act by the Oregon legislature in 2021, our state's recycling system is expected to undergo significant improvements. The new law went into effect January 1, 2022 and program changes will start in July 2025.

The act will make it easier for people to recycle by standardizing what materials can be recycled statewide. The act also contains rules that recycled items will be sent to responsible end markets. That means communities across Oregon will be able to recycle the same materials no matter where they live in the state and recycling services will be more equitable.

The law requires producers of packaging, paper products and food serviceware to form a producer responsibility organization to share responsibility in the management of their products after they are thrown away. The law also introduces new responsibilities and potential funding opportunities for local governments managing recycling programs and facilities, including Metro and the cities and counties in greater Portland.

Metro is a collaborator on the Recycling Modernization Act. While contributing to the act's development, Metro considered council's priority targets for meeting climate and resilience goals as well as growing a resilient economy for all. The act supports Metro's priority targets through efforts to reduce plastic pollution, ensure recyclable materials are sent to responsible end markets with proven environmental benefits, and create more jobs with living wages.

Metro participated in a recycling steering committee and various rulemaking advisory committees led by the Oregon Department of Environmental Quality to help develop and guide implementation of the Recycling Modernization Act. Local governments and industry partners also participated.

Metro advocated on behalf of the region to ensure the act would help advance 2030 Regional Waste Plan goals. Metro is monitoring and will pursue all opportunities available to leverage funding and partnerships associated with the Recycling Modernization Act to invest in existing and new facilities (depots) as envisioned in the Regional System Facilities Plan investment strategy.

The investment opportunities identified in this plan aim to improve waste reduction, increase access to services, and keep fees affordable. The Recycling Modernization Act will complement the Regional System Facilities Plan at the state level by addressing gaps in the recycling system and requiring producers to help fund the system expansion that is necessary to ensure equitable access to services for all community members.

The law establishes consistent statewide recycling lists for households and businesses with a path for the producer responsibility organization to expand recycling of new materials.

**Local government recycling acceptance list**

This list refers to the materials to be collected from homes and businesses through the on-route collection programs run by cities and counties and at designated depots. The new statewide list will be similar to greater Portland's current recycling list while the rest of the state builds up the infrastructure to expand services. Producers are required to provide funding to support local government's ability to build or expand capacity to accept these materials.

**Producer responsibility organization (PRO) recycling acceptance list**

The producer responsibility organization is responsible for managing a second list of harder-to-recycle items that cannot go in the curbside recycling bin. These materials will be managed by establishing convenient collection points, which could include retail store drop offs, depots and collection events. Producers are required to cover the costs of collecting these materials and, where possible, to contract with existing recycling depots or drop-off centers, before establishing other facilities or programs. The current proposed materials that producers are responsible for collecting at these locations include:



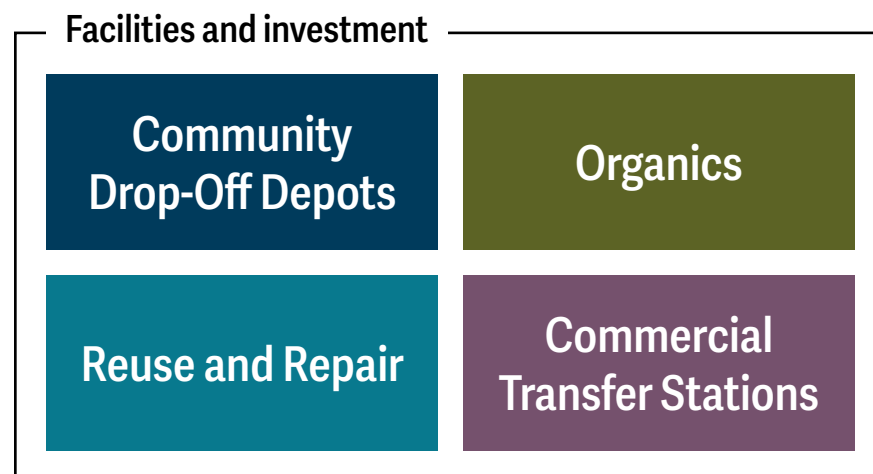
These lists may change over time as new systems and responsible end markets are identified by the producer responsibility organization. To see the current materials on both lists, please visit the [Oregon Department of Environmental Quality's adopted recycling acceptance lists](#).

# CHAPTER 4: INVESTMENT STRATEGY



# OVERVIEW OF INVESTMENT STRATEGY

The investment strategy involves updating some of Metro’s current facilities, adding new facilities in the region, and launching new programs and partnerships. The strategy centers on improving waste reduction, increasing access and keeping costs affordable. The strategy includes four key areas of investment:



Investments will be phased in during the next 20 years and each investment project will require a more detailed project management plan for implementation. The project management plans will take projects from their current conceptual nature and detail out a scope, governance structure, schedule and budget. Elements that will be included in the project management plans are discussed in Chapter 7.

This chapter provides an overview of each of the investments. The facility descriptions and estimates of cost, access, jobs and environmental benefits presented in this plan are conceptual and will need to be refined as projects are advanced for implementation. References to a “baseline” relate to the conditions or costs if these investments are not implemented.

**The investment strategy:**

- Sets 20-year vision and blueprint for investments to improve the reuse, recycling and garbage system
- Focuses on waste reduction, increased access and affordability
- Allows projects, large and small, to move forward to planning or construction
- Identifies areas where more study, analysis and discussion are needed

## COMMUNITY DROP-OFF DEPOTS

Community drop-off depots serve as convenient locations where residents and businesses such as contractors, landscapers and roofing companies can bring a wide range of materials. These facilities handle materials in ways that maximize opportunities for reuse, repair and recycling. Services offered include:

- Free drop off for reusable items
- Free source-separated recycling for materials not collected curbside
- Free disposal of household hazardous waste
- Self-haul stations for garbage, yard debris and construction and demolition debris

*Photo credit: Photo courtesy of the City of Burnaby, Burnaby, BC Canada.*



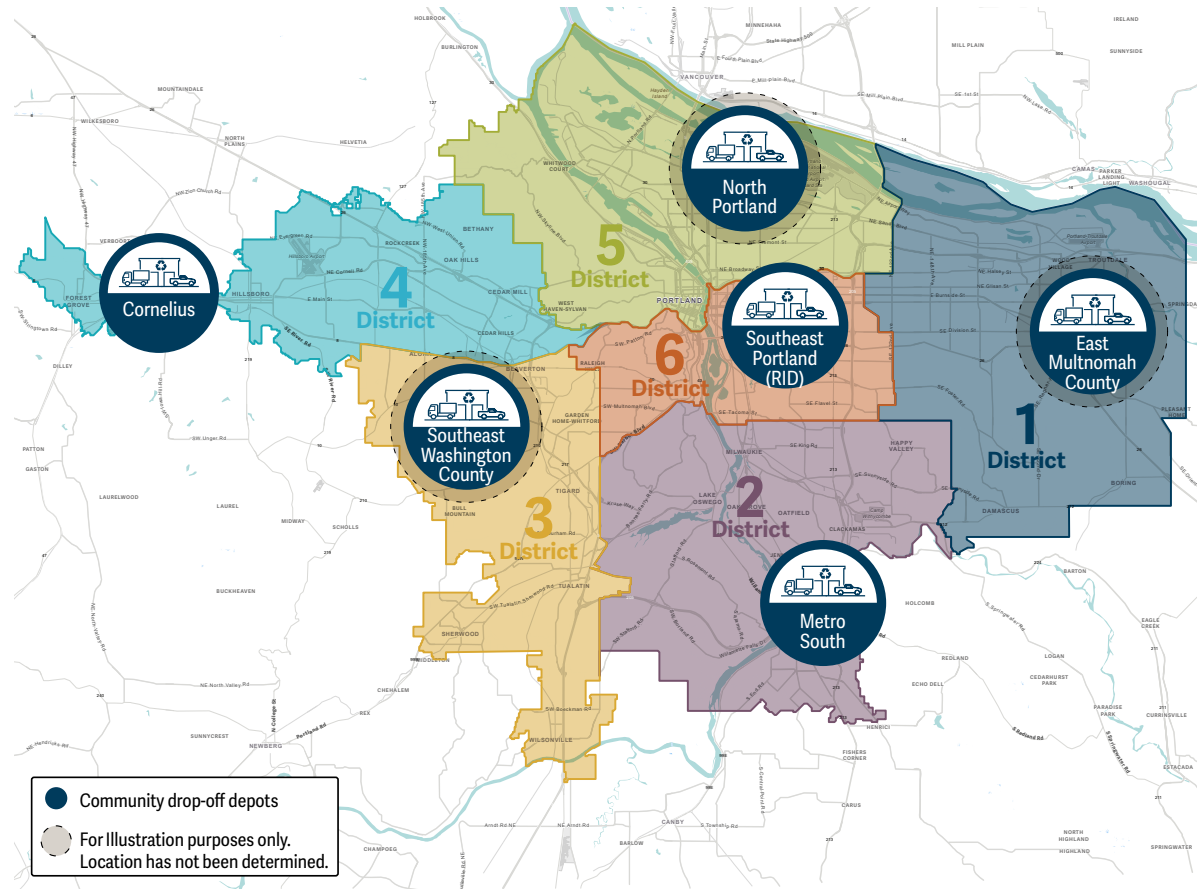


# COMMUNITY DROP-OFF DEPOT INVESTMENTS

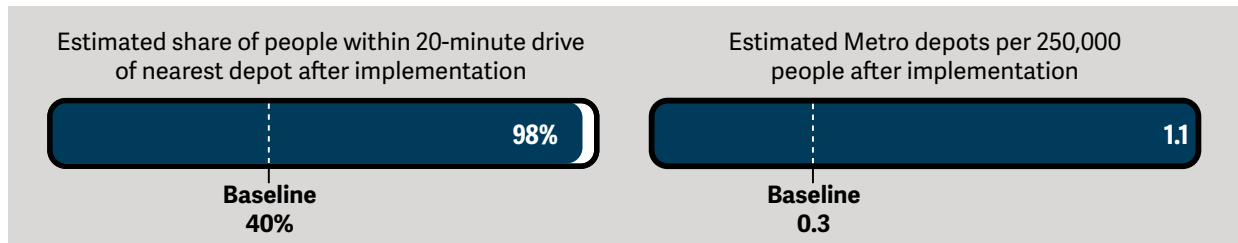
The plan is to establish six depots, one in each Metro Council district. Three depots will be located on existing Metro-owned properties, located in Cornelius, Southeast Portland and Metro South in Oregon City. For the rest, Metro will conduct siting studies to find industrial properties of 2 to 4 acres. The goal is to create a network of depots that ensures equitable access to people across the region and creates benefits for the communities that live nearby.

The following pages detail these depots and the implementation order, starting with the first depot in Cornelius.

In addition to the six Metro-owned depots, the plan also includes potential investment in existing private facilities to expand access to depot services. To do this, Metro will pursue public-private partnerships with strategically located private facilities in the region. Examples of potential partnerships include: (1) partnering with private facility owners to site depots, with Metro providing funding for infrastructure development, or (2) working with private facilities to enhance services at existing smaller depots.



**Build accessible self-haul depots for reuse, recycling, household hazardous waste and garbage.**



## HIGHLIGHT

Renovated in 2016, the **North Transfer Station** in **Seattle, Washington**, serves residential and business self-haul customers. Although the facility also serves commercial haulers, separate traffic lanes and entrances keep self-haul vehicles away from large trucks.

Self-haul customers can drop off reuse and recycling items at no charge. The facility also accepts yard debris, clean wood and garbage. The transfer station is on a 5-acre site near a residential area. More than an acre of open space buffers the facility and offers a play area, a sports court, an open lawn, walkways and static exercise stations. The Education Room in the main building allows visitors to view operations and interactive exhibits.



# COMMUNITY DROP-OFF DEPOTS

## CORNELIUS

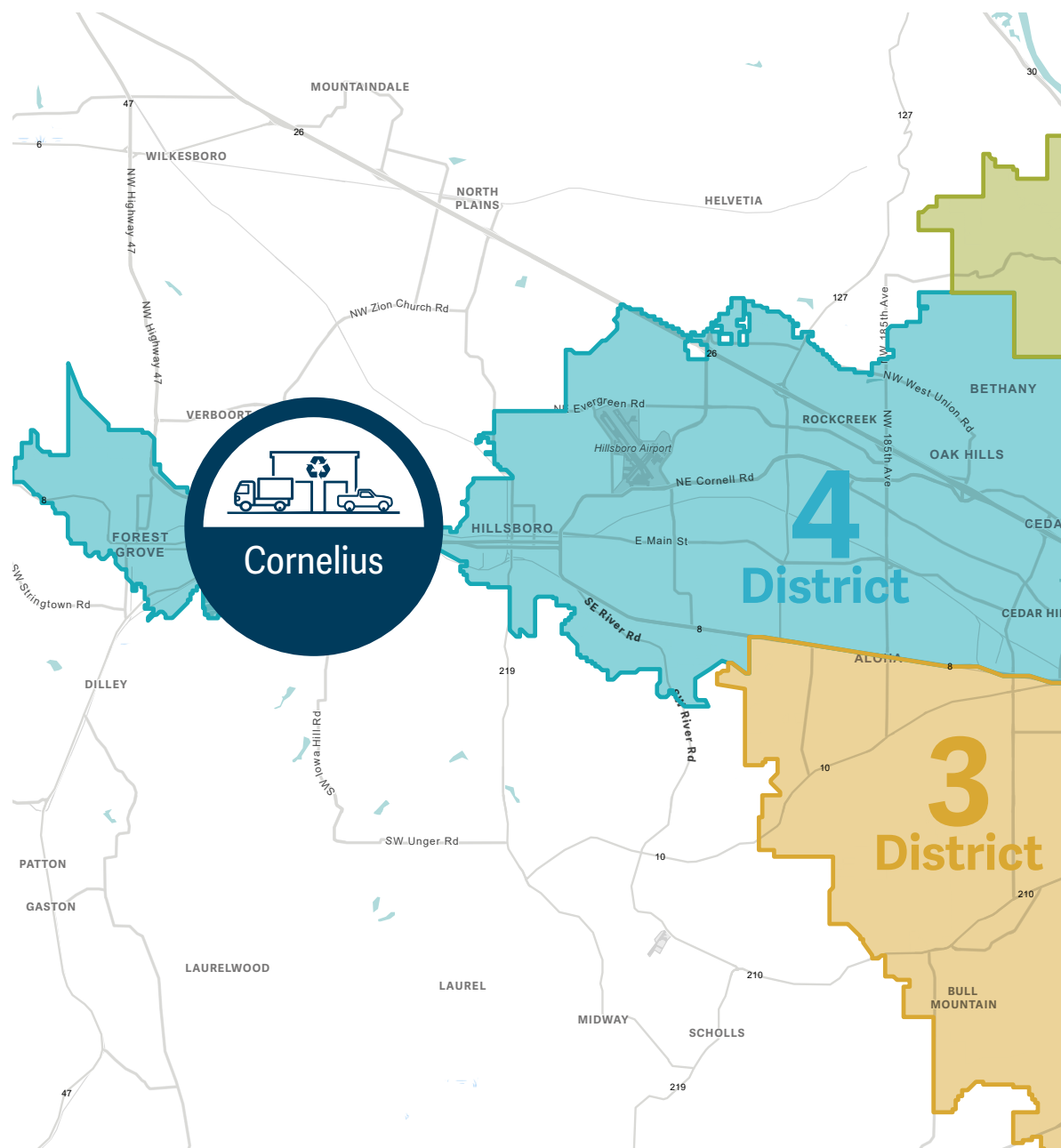
Developing a community drop-off depot in Washington County is a top priority for Metro, which already owns an 11-acre vacant site in Cornelius. This new facility will enhance access to and the affordability of self-haul garbage disposal services for nearly 120,000 residents in Washington County. The gap assessment for this region identified several deficiencies in garbage and recycling services. The Cornelius depot will help address these by offering free materials drop-off for reuse and recycling, safe disposal of household hazardous waste and affordable self-haul disposal services.

### Planning

Planning and design for the Cornelius community drop-off depot will start when the plan is adopted. Lessons learned from installation and operation of the Cornelius community drop-off depot will be used to inform siting, design, and operation decisions for the other community drop-off depots.

### Regional Impact

<b>Location</b>	City of Cornelius, Metro Council District 4
<b>Size</b>	2-acre to 4-acre portion of the 11-acre property
<b>Waste Reduction</b>	5,000 tons per year
<b>Avoided Greenhouse Gas Emissions</b>	12,200 metric tons of CO <sub>2</sub> e per year
<b>Metro Jobs</b>	15 full time equivalent
<b>Capital Costs</b>	\$29 Million (2024\$)
<b>Annual Operation/Maintenance Costs</b>	\$7.9 Million (2024\$)



**Services and materials accepted**

- ☑ Reusable items, such as appliances and furniture
- ☑ Recyclables, including hard-to-recycle items such as plastic film and Styrofoam
- ☑ Landscaping/yard debris
- ☑ Household hazardous waste
- ☑ Residential and small-business construction waste

## HIGHLIGHT

The **Zero Waste Centre in Vancouver, British Columbia**, was built in 2018 and is an example of a small, centrally located depot in an urban area. The facility provides a convenient location for residents to drop off a wide range of materials for reuse and recycling free of charge. This includes hazardous materials that require special handling, such as batteries and propane tanks.



# COMMUNITY DROP-OFF DEPOTS

## SOUTHEAST PORTLAND (RID)

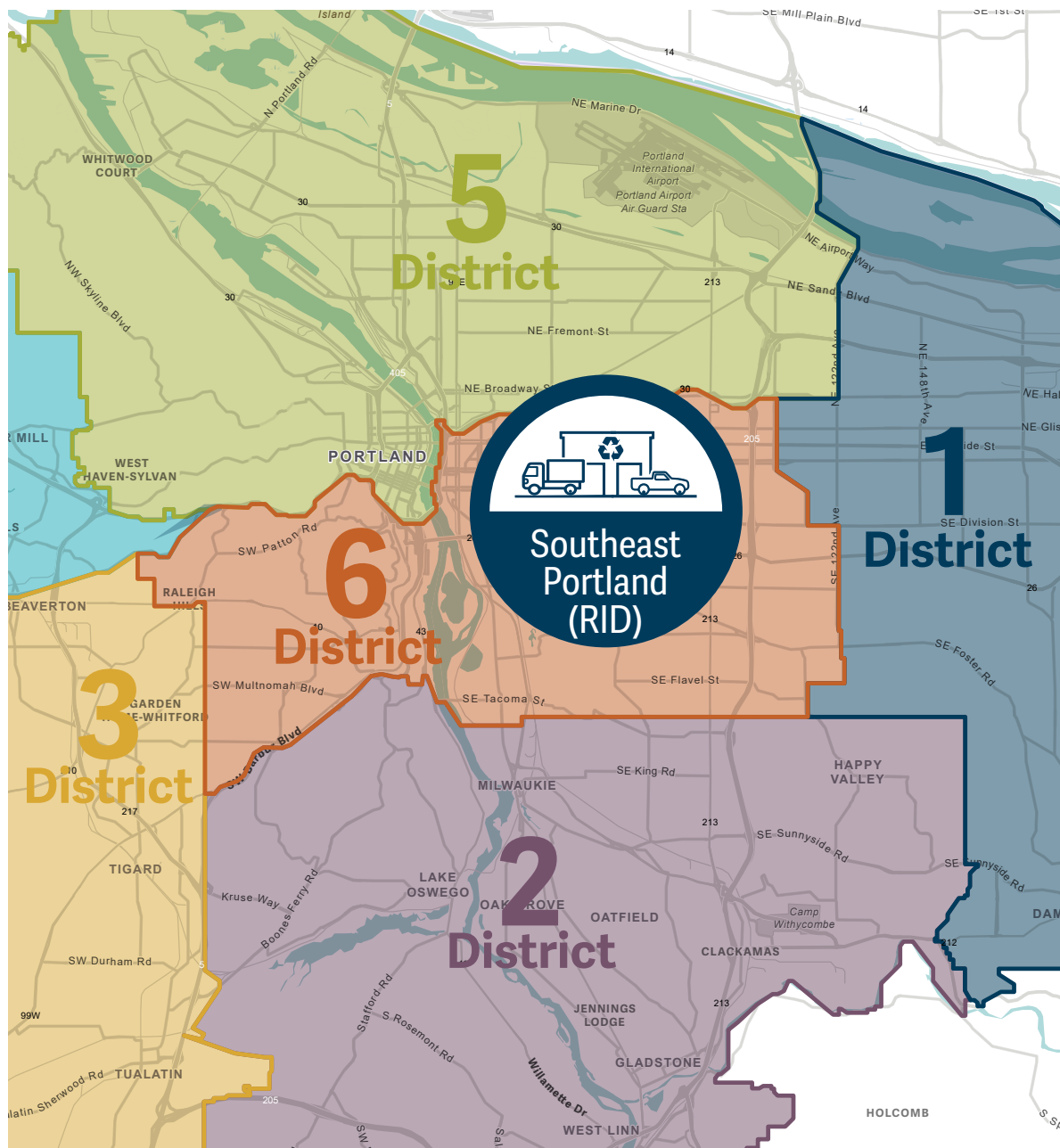
For the Southeast Portland community drop-off depot, Metro will consider the feasibility of using a small portion of an existing Metro-owned site, the Regional Illegal Dumping program (RID) Deployment Center. The RID Deployment Center is a 1-acre property with potential to support recycling drop-off services for the public. This facility would increase access to recycling services to approximately 270,000 residents in the heart of the city of Portland. The Southeast Portland community drop-off depot will address recycling service gaps identified in the gap analysis portion of this project by accepting a specific subset of materials for recycling, to be determined in planning and design.

### Planning

A feasibility study will begin when the plan is adopted and help evaluate the suitability of combining a recycling drop-off area with existing RID operations. If the RID Deployment Center is determined to not be suitable for a community drop-off depot, Metro will perform a siting study to build a small community drop-off depot in southeast Portland in Metro Council District 6.

### Regional Impact

<b>Location</b>	Southeast Portland, Metro Council District 6
<b>Size</b>	0.2-acre to 0.5-acre
<b>Waste Reduction</b>	1,700 tons per year
<b>Avoided Greenhouse Gas Emissions</b>	4,400 metric tons of CO <sub>2</sub> e per year
<b>Metro Jobs</b>	5 full time equivalent
<b>Capital Costs</b>	\$0.3 Million (2024\$)
<b>Annual Operation/Maintenance Costs</b>	\$1.3 Million (2024\$)



- Services and materials accepted**
- Small reusable items, such as appliances and clothing
  - Recyclables, including hard-to-recycle items such as plastic film and Styrofoam
  - Limited amounts of household hazardous waste

## HIGHLIGHT

The **El Cerrito Recycling and Environmental Resource Center** in **El Cerrito, California**, offers community members a convenient way to reduce their environmental footprint at a one-stop shop for reuse and recycling. In addition to offering a place to bring difficult-to-recycle items such as bicycles, books, eyeglasses, textiles and pharmaceuticals, it also has an “Exchange Zone” that promotes the exchange of reusable items. El Cerrito periodically sells compost produced locally from green waste materials, has a free seed library and also has drop-off barrels for food bank donations. It is a LEED certified facility that features a zero-net energy building, recycled rain-water catchment, rain gardens, native plantings and reused building materials.

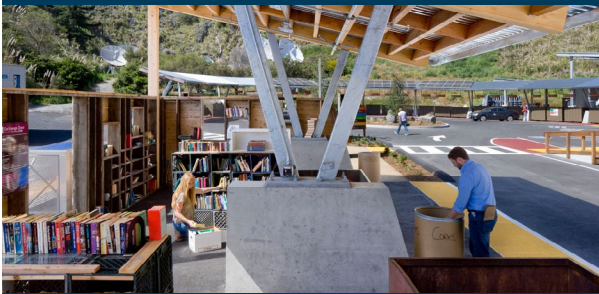


Photo credit: El Cerrito Recycling Center, El Cerrito, CA

# COMMUNITY DROP-OFF DEPOTS

## EAST MULTNOMAH COUNTY

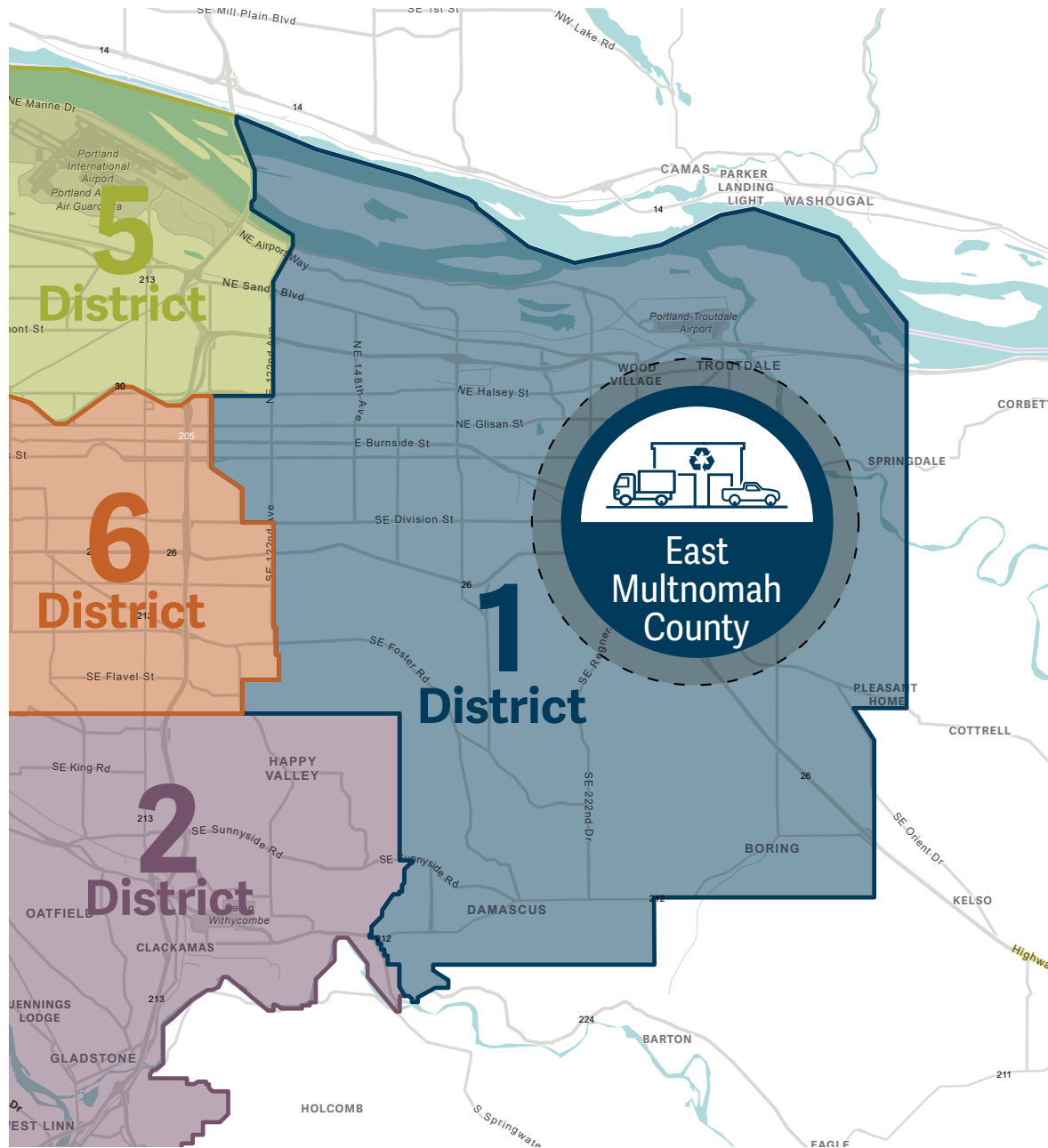
This East Multnomah County depot will increase access and resiliency of waste services to approximately 290,000 residents on the east side of the region in Multnomah and Clackamas counties. The East Multnomah County community drop-off depot will address service gaps for residents who currently must drive more than 20 minutes for self-haul disposal services, household hazardous waste and source-separated recycling. Additionally, the East Multnomah County community drop-off depot will provide equitable disposal for residents and address service demand from above-average projected population growth in the east portion of the region.

### Planning

This project will begin with a siting study for the East Multnomah County depot with the intention to purchase a property. Subsequent planning and design of the depot will begin following a property purchase, and the facility will open to the public a few years later. Design for this facility will expand on the success and learning from the depots that will have been built in earlier phases of this plan.

### Regional Impact

<b>Location</b>	East Multnomah County, Metro Council District 1
<b>Size</b>	2-acre to 4-acre property
<b>Waste Reduction</b>	5,100 tons per year
<b>Avoided Greenhouse Gas Emissions</b>	12,200 metric tons of CO <sub>2</sub> e per year
<b>Metro Jobs</b>	15 full time equivalent
<b>Capital Costs</b>	\$35 Million (2024\$)
<b>Annual Operation/Maintenance Costs</b>	\$8.3 Million (2024\$)



**Services and materials accepted**

- Reusable items such as appliances and furniture
- Recyclables, including hard-to-recycle items such as plastic film and Styrofoam
- Landscaping/yard debris
- Household hazardous waste
- Residential and small-business construction waste

## HIGHLIGHT

The **Eco-Cycle Center for Hard-to-Recycle Materials (CHaRM)** in **Boulder, Colorado**, opened in 2001 as the first facility of its kind in the U.S. to collect multiple materials for recycling such as electronics, plastic bags, textiles and mattresses, all in one place. CHaRM currently diverts 25 categories of hard-to-recycle materials from the landfill. CHaRM is funded in part by a \$3 vehicle entrance fee and charging for some items such as appliances. It also receives City of Boulder trash tax dollars. Next door to CHaRM is Resource Central, a place to donate and purchase reused items.



Photo credit: Photo courtesy of the Eco-Cycle Center for Hard-to-Recycle Materials

# COMMUNITY DROP-OFF DEPOTS

## METRO SOUTH

Metro will redevelop the Metro South facility to provide expanded self-haul public services within the existing footprint of the property. This updated facility will provide services to approximately 280,000 residents in the region and would be the largest community drop-off depot operated by Metro. Over time, Metro South will transition some or all commercial haulers away from the site to another nearby facility. The redevelopment of Metro South aligns with Metro’s vision to increase access to facilities that support waste reduction over processing waste to landfill.

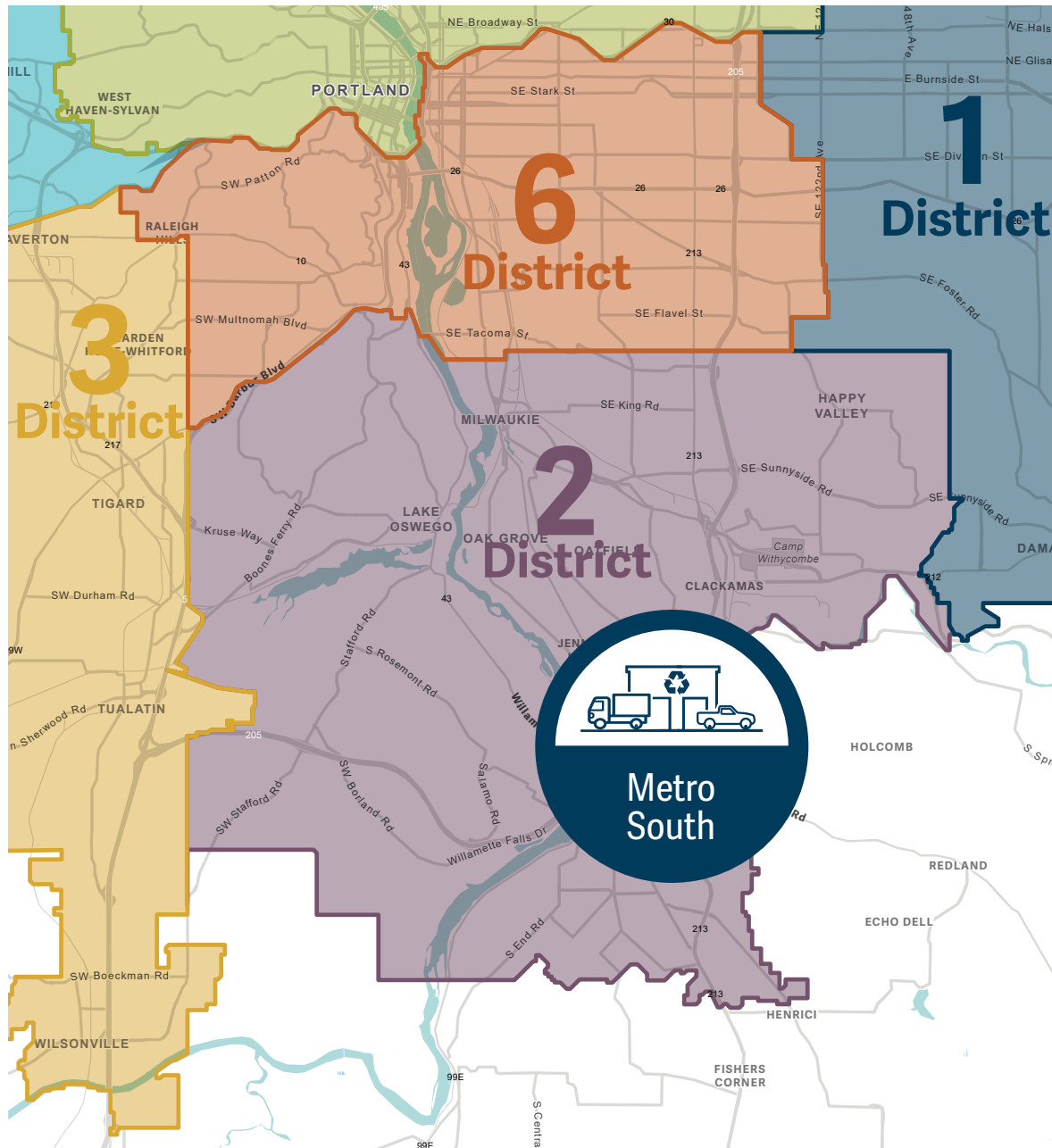
### Planning

A siting and design study will be the first step to redevelop Metro South into a large self-haul only community drop-off depot. However, Metro South will not stop accepting materials from commercial haulers until a designated commercial-only public-private partnership facility is operational in Metro Council District 2. The commercial-only public-private partnership facility is essential to prevent commercial service gaps in the southeast portion of the region (refer to pages 45-48).

### Regional Impact

<b>Location</b>	Oregon City, Metro Council District 2
<b>Size</b>	12 acres
<b>Waste Reduction</b>	7,800 tons per year
<b>Avoided Greenhouse Gas Emissions</b>	18,300 metric tons of CO <sub>2</sub> e per year
<b>Metro Jobs</b>	20 full time equivalent
<b>Capital Costs</b>	\$60 Million (2024\$)
<b>Annual Operation/Maintenance Costs</b>	\$12.3 Million (2024\$)





### Services and materials accepted

- Reusable items such as appliances and furniture
- Recyclables, including hard-to-recycle items such as plastic film and Styrofoam
- Landscaping/yard debris
- Household hazardous waste
- Residential and small-business construction waste

## HIGHLIGHT

The **Tacoma Recovery and Transfer Center** in **Tacoma, Washington**, has a large area for residents to bring and self-sort a variety of materials, including books, batteries, Styrofoam blocks, electronics, motor oil and other more common recyclable materials, separate from the self-haul garbage and household hazardous waste facility.



# COMMUNITY DROP-OFF DEPOTS

## NORTH PORTLAND

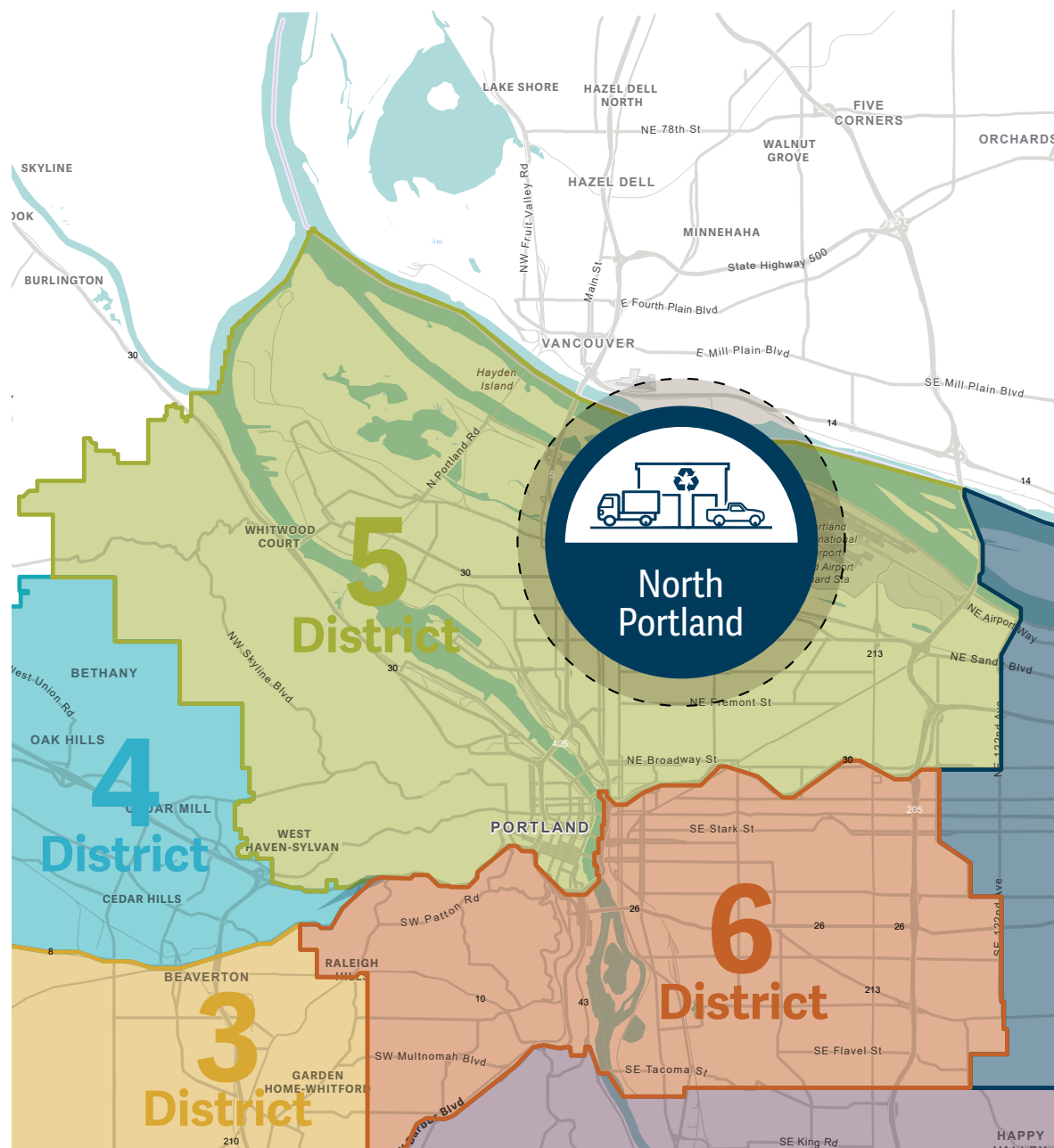
The North Portland community drop-off depot will replace and expand self-haul services currently provided at Metro Central. The new depot will increase access to self-haul garbage disposal services in Multnomah County for approximately 160,000 residents.

### Planning

A siting study will be the first step toward developing the North Portland community drop-off depot. The study will identify suitable industrial-zoned properties and conclude with purchasing a property. After a site is secured, planning and design for the North Portland community drop-off depot will begin. Lessons learned from siting and building this depot will inform future siting and design decisions for the other community drop-off depots.

### Regional Impact

<b>Location</b>	North Portland, Metro Council District 5
<b>Size</b>	2-acre to 4-acre property
<b>Waste Reduction</b>	5,100 tons per year
<b>Avoided Greenhouse Gas Emissions</b>	12,200 metric tons of CO <sub>2</sub> e per year
<b>Metro Jobs</b>	15 full time equivalent
<b>Capital Costs</b>	\$35 Million (2024\$)
<b>Annual Operation/Maintenance Costs</b>	\$8.4 Million (2024\$)



- Services and materials accepted**
- ☑ Reusable items, such as appliances and furniture
  - ☑ Recyclables, including hard-to-recycle items like plastic film and Styrofoam
  - ☑ Landscaping/yard debris
  - ☑ Household hazardous waste
  - ☑ Residential and small-business construction waste

## HIGHLIGHT

In the Toronto metropolitan area, the **Peel regional government operates six community recycling centres (CRCs)** that serve 1.4 million people across three cities. The CRCs focus solely on residential and business self-haul customers, providing disposal options for recyclable materials, yard waste, construction and demolition material, garbage and household hazardous waste. Residents can also purchase compost and composting equipment, as well as donate reusable items to be sold by non-profit partners that operate thrift stores at the CRCs.



# COMMUNITY DROP-OFF DEPOTS

## SOUTHEAST WASHINGTON COUNTY

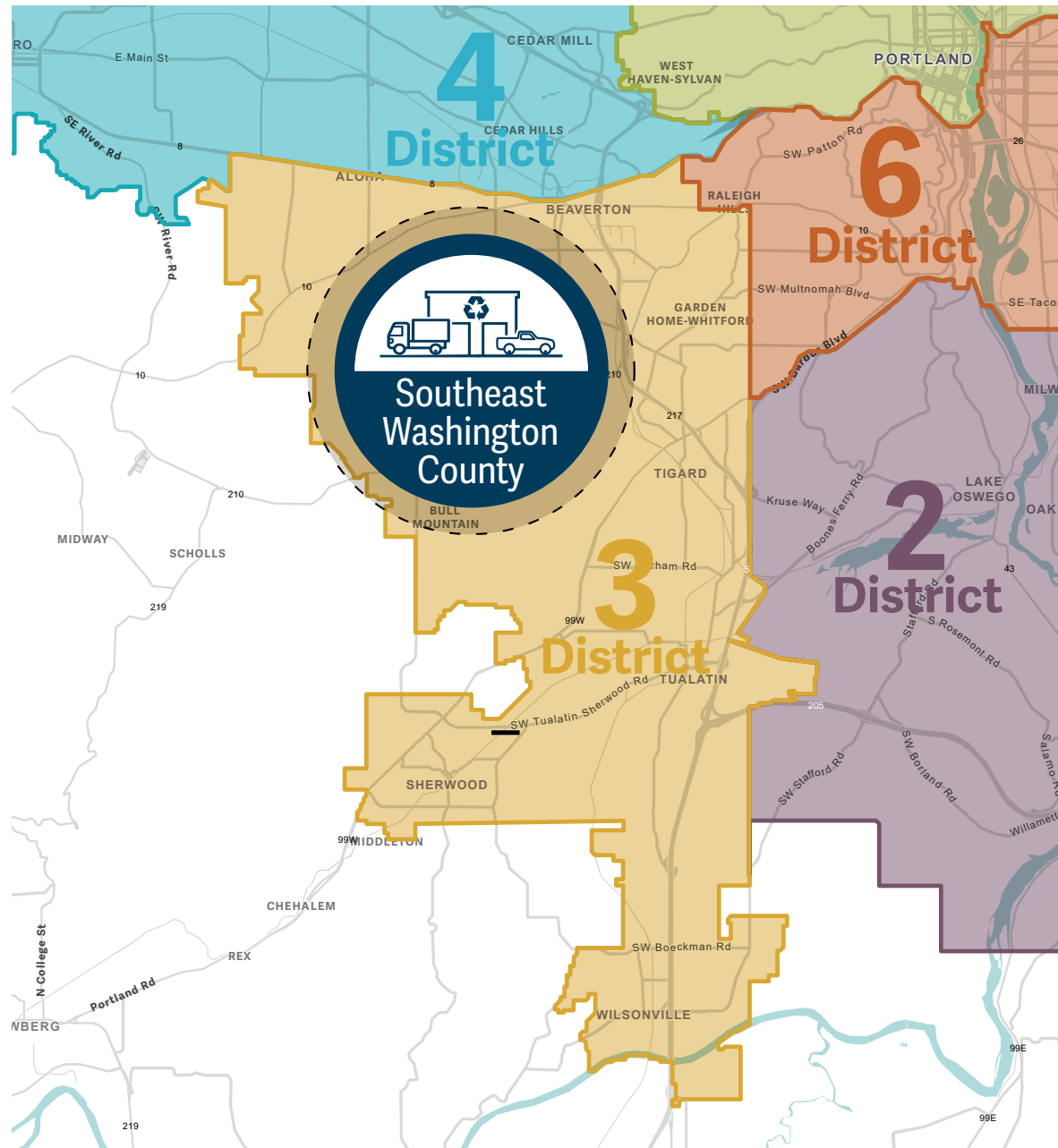
The Southeast Washington County depot will increase access and resiliency of waste services to approximately 510,000 residents on the west side of the region. The new depot will provide closer services for residents who currently must drive more than 20 minutes for self-haul disposal services, household hazardous waste and hard to recycle items such as mattresses. Additionally, the Southeast Washington County community drop-off depot will mitigate service demand from above-average projected population growth in that part of the region.

### Planning

This project will begin with a siting study for the Southeast Washington County depot with the intention to purchase a property. Subsequent planning and design of the depot will begin following a property purchase, and the facility will open to the public a few years later. Design for this facility will expand on the success and learning from the depots that will be built in earlier phases of this plan.

### Regional Impact

<b>Location</b>	Southeast Washington County, Metro Council District 3
<b>Size</b>	2-acre to 4-acre property
<b>Waste Reduction</b>	5,500 tons per year
<b>Avoided Greenhouse Gas Emissions</b>	12,300 metric tons of CO <sub>2</sub> e per year
<b>Metro Jobs</b>	15 full time equivalent
<b>Capital Costs</b>	\$35 Million (2024\$)
<b>Annual Operation/Maintenance Costs</b>	\$10.6 Million (2024\$)



**Services and materials accepted**

- Reusable items such as appliances and furniture
- Recyclables, including hard-to-recycle items such as plastic film and Styrofoam
- Landscaping/yard debris
- Household hazardous waste
- Residential and small-business construction waste

## REUSE AND REPAIR

Reuse and repair facilities and programs are crucial for supporting the transition to a more circular economy and reducing the negative health and environmental impacts of generating new products such as using raw materials, natural resources and energy. Metro is working toward a future where we use fewer new materials, throw away less and recover more. Reuse, repair and share organizations provide low to no-cost options for people to get rid of unwanted items and access to affordable items. These organizations play a crucial role in diverting waste from landfills.

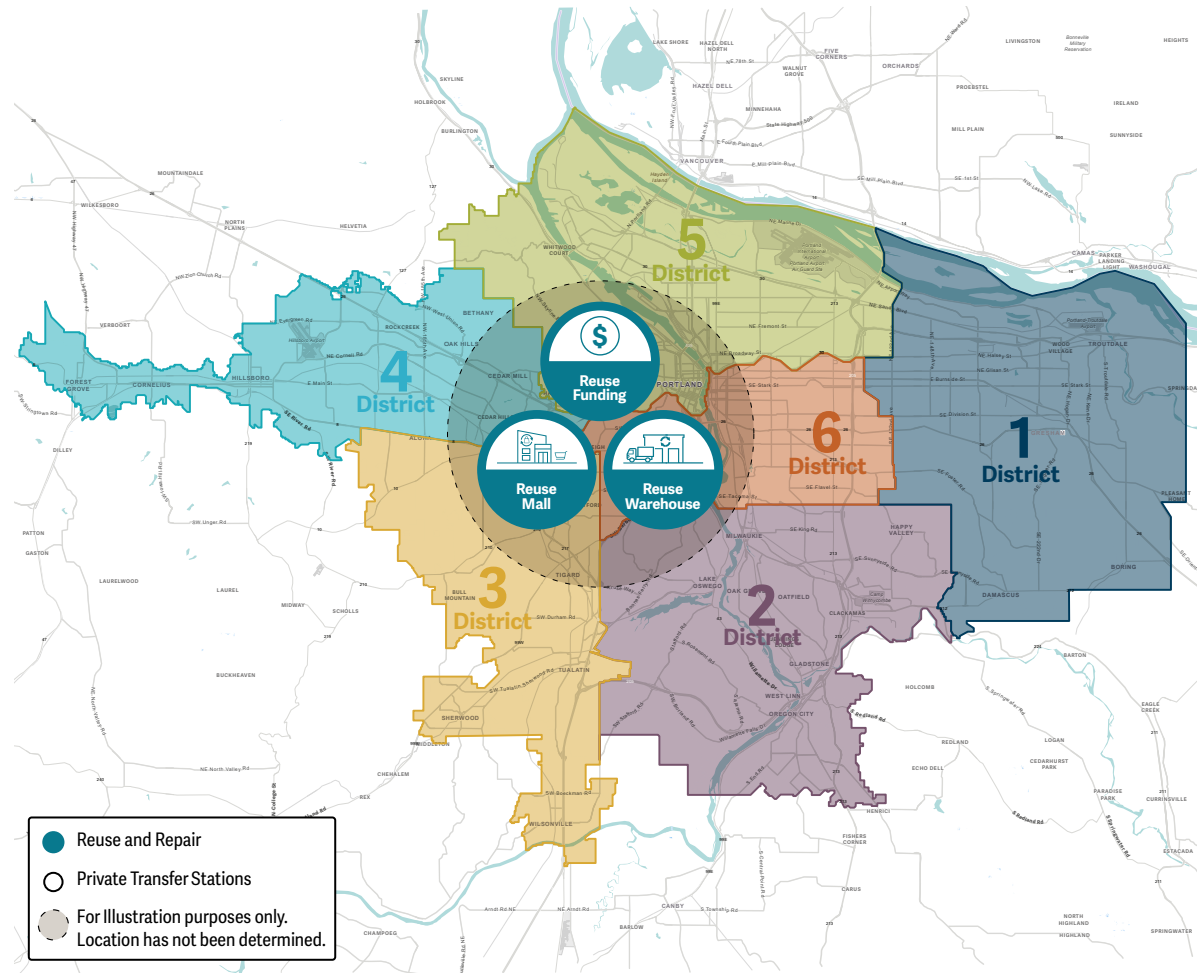


## REUSE AND REPAIR INVESTMENTS

Increasing financial support for the reuse and repair sector and partnering with reuse organizations to plan and operate new facilities will be important to filling identified gaps and to move toward meeting Oregon’s statewide goal of cutting total waste generation to 15 percent below 2012 levels. For the Metro region, this translates to generating about a quarter less waste than we do today, which means reducing our current amount of approximately 2.6 million tons of waste per year by 725,000 tons. To work toward meeting this goal, the vision is to make the following investments:

**Reuse warehouse** – A warehouse would allow for multiple reuse organizations and businesses to store, process and repair used items collected from residents or businesses at the same facility or elsewhere.

**Reuse mall** – A mall where multiple organizations and businesses could sell used, upcycled and refurbished items. The facility could provide space for community gatherings and sustainability events and for food vendors focused on sustainably sourced ingredients and low-carbon food options. The facility could also sell recycled paint (from MetroPaint) and compost and offer areas for the public to drop off recyclables not accepted at the curb, such as plastic film.



**Reuse Impact Fund** – To grow a more robust reuse, repair and share economy, organizations need consistent funding to support the services they provide to the region. This fund would provide multi-year funding for reuse businesses to support and grow their work in diverting materials from landfill.

Increase financial support for reuse sector and partner with reuse organizations to plan and operate new facilities.

## HIGHLIGHT

**ReTuna Återbruksgalleria**, situated in **Eskilstuna, Sweden**, was established in August 2015 as the world's first shopping mall dedicated to promoting sustainable practices by exclusively selling secondhand and upcycled goods.

The mall is adjacent to a recycling center that provides an area for residents to drop off used items, assisted by about 12 employees who sort the items in a warehouse located under the shop floor. The reuse warehouse facilitates sorting and redistribution of materials for resale or upcycling into new products, promoting waste reduction and responsible consumer behavior.



Photo credit: Courtesy of ReTuna Återbruksgalleria, situated in Eskilstuna, Sweden.

## REUSE AND REPAIR

### REUSE WAREHOUSE

The Reuse Warehouse will provide a central hub for reuse organizations to collaborate, sort and store materials and repair items. This facility is proposed to meet the needs identified by local reuse organizations and businesses and provide flexible warehouse space to cultivate and expand the growth of reuse within the region. The Reuse Warehouse will be a Metro-owned facility and would enter into mutually beneficial agreements with reuse organizations to access and use the space.

#### Planning

Metro will develop a programming concept in partnership with reuse organizations and perform a siting study to identify an accessible commercial/industrial space of approximately 50,000 square feet. The siting study will identify buildings to purchase or lease. Following the purchase or lease of the building, Metro will likely renovate the building to provide space for reuse organizations to repair and refurbish materials. Implementation and operation of the Reuse Warehouse will benefit existing reuse nonprofits and businesses.

#### Facility Summary and Regional Impact

<b>Size</b>	approximately 50,000 square feet
<b>Waste Reduction</b>	2,700 tons per year
<b>Avoided Greenhouse Gas Emissions</b>	6,200 metric tons of CO <sub>2</sub> e per year
<b>Metro Jobs</b>	3 full time equivalent
<b>Estimated Regional Jobs</b>	16 full time equivalent
<b>Capital Costs</b>	\$16 Million (2024\$)
<b>Annual Operation/Maintenance Costs</b>	\$0.4 Million (2024\$)



## HIGHLIGHT

**ReTuna Återbruksgalleria in Eskilstuna, Sweden**, is a 3,000-square-meter mall housing 14 shops offering a diverse range of reused products such as sportswear, furniture, fashion items and toys. The mall attracts more than 700 visitors per day and generates an annual turnover of approximately \$1.8 million. Residents are encouraged to drop off unwanted items for potential resale or refurbishment, thereby diverting goods from landfills. Through its efforts, ReTuna plays a crucial role in educating the community about waste prevention and the circular economy and organizing various awareness-raising activities such as thematic days and workshops with a sustainability focus.



Photo credit: Courtesy of ReTuna Återbruksgalleria, situated in Eskilstuna, Sweden.

# REUSE AND REPAIR

## REUSE MALL

The Reuse Mall will be a Metro-owned or leased commercial retail facility that will host a collection of diverse secondhand retail stores run by reuse nonprofits and businesses. The Reuse Mall will promote material reuse around the region and provide a central hub for people to shop sustainably by giving goods a second life and diverting them from landfills.

### Planning

Metro will work with reuse partners to initiate a programming concept and siting study for the Reuse Mall. This work will aim to identify an accessible commercial retail space of approximately 30,000 square feet for purchase or lease. Metro, with input from reuse partners, will improve or renovate the building to develop a facility for subleasing by reuse businesses and organizations to sell reusable items and create a community hub for reuse. The mall will be operated in partnership with reuse organizations and businesses.

### Facility Summary and Regional Impact

<b>Size</b>	approximately 30,000 square feet
<b>Waste Reduction</b>	NA
<b>Avoided Greenhouse Gas Emissions</b>	NA
<b>Metro Jobs</b>	3 full time equivalent
<b>Estimated Regional Jobs</b>	10 full time equivalent
<b>Capital Costs</b>	\$21 Million (2024\$)
<b>Annual Operation/Maintenance Costs</b>	\$0.4 Million (2024\$)



# REUSE AND REPAIR

## REUSE IMPACT FUND

The Reuse Impact Fund is a Metro program that will be developed to provide ongoing, predictable funding to reuse, repair and share organizations and businesses. The funding aims to support maintenance and expansion of services provided by the reuse, repair and share sector, such as home pickup services that reach people who cannot drive to a facility to drop off reusable items. As part of the funding program, Metro will require awarded contracts to provide data on the amounts and types of materials recovered for reuse so that Metro can track, evaluate and share the sector’s impact, economic performance and environmental benefits.

### Planning

Metro is recommending a 3-year pilot for the Reuse Impact Fund, with funds expected to be distributed to organizations based on developing criteria and an organization’s potential to divert materials from landfills.

### Facility Summary and Regional Impact

<b>Waste Reduction</b>	7,700 tons per year
<b>Avoided Greenhouse Gas Emissions</b>	17,600 metric tons of CO <sub>2</sub> e per year
<b>Metro Jobs</b>	1.5 full time equivalent
<b>Estimated Regional Jobs</b>	45 full time equivalent
<b>Annual Operation/Maintenance Costs</b>	\$2.7 Million (2024\$)



## ORGANICS

The region's organics infrastructure handles the food waste, yard debris and clean wood that is collected by haulers from households and businesses or directly taken to a facility by residents and small businesses such as landscapers. Food is the single largest recoverable portion of the region's waste stream and is second only to vehicles for greenhouse gas emissions generated by people in Oregon.

Food scraps are picked up by haulers from grocery stores, restaurants, and businesses and then brought to a transfer station that accepts this material. Food scraps are dropped off in many forms, some of which require additional preparation before they can be taken to a compost or digestion facility for processing.

Food waste processing facilities use food scraps to make compost or biogas, keeping materials out of landfills and reducing our impact on the environment.

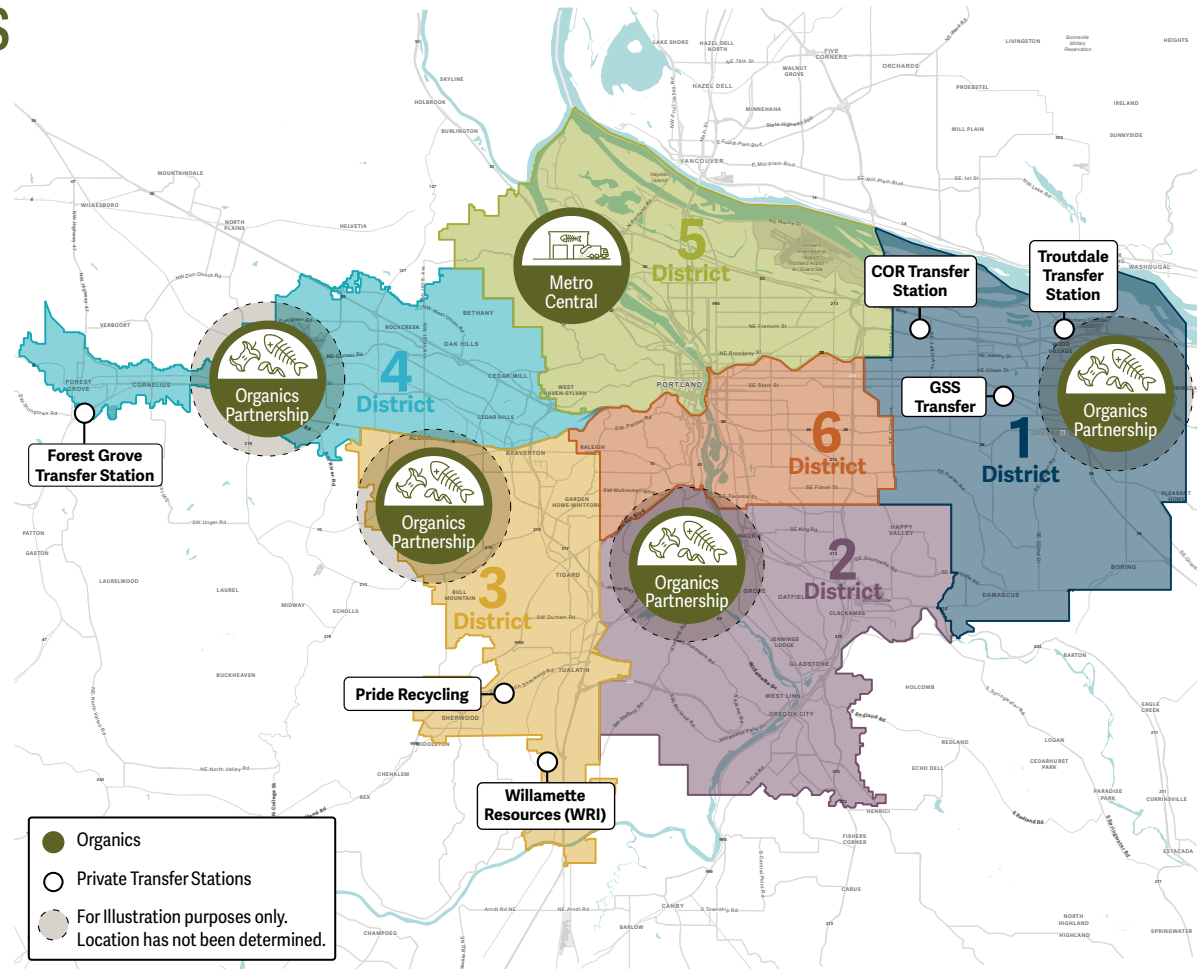
Depackaging and preprocessing equipment is essential organics infrastructure to support food waste processing capacity.



# ORGANICS INVESTMENTS

Preventing wasted food is the most preferred method to address food waste because it minimizes the environmental impacts of food production and disposal. Landfilling wasted food is the least preferred method because it contributes to greenhouse gas emissions as food decomposes. While Metro will continue implementing programs aimed at preventing wasted food, there is still a large amount of wasted food that can be processed into beneficial compost or fertilizer.

Expanding the transfer and processing capacity of organics for both the public and private sectors is essential to filling the gaps identified in the region for this material. This will aid in the region’s ability to reduce greenhouse gases associated with landfilling organics or transferring them to far-off locations for additional processing. This plan addresses this need in two different ways, further described in the pages that follow.



Add transfer and processing of organics for both the public and private sectors and explore public-private partnerships.

Depackaging technology ensures Metro will produce quality feedstocks by reducing contamination delivered to organics processing end markets such as composting and anaerobic digestion.



# ORGANICS

## METRO CENTRAL ORGANICS HUB

Investing in Metro Central to become an organics hub for the region is a priority to be able to provide a place to accept, clean and process commercial and residential organics. Metro will continue to invest in Metro Central to solidify it as a regional hub for receiving residential and commercial organics from haulers, removing contamination and transferring to the best end markets available. Under this approach, over time, Metro will convert Metro Central to a facility that exclusively serves commercial haulers after the North Portland community drop-off depot is operational. The proposed investments at Metro Central include the purchase and installation of depackaging equipment to remove contamination. It also includes building and equipment upgrades to support operating the facility to focus exclusively on commercial haulers for another two decades. Planning is already under way.

### Planning

Organics depackaging equipment will be installed near the beginning of Phase 1 following an ongoing design study to identify the best suitable technology. Depackaging equipment is the first step toward providing quality feedstock materials to end markets such as composting and anaerobic digestion. Future building upgrades at Metro Central will take place after the North Portland community drop-off depot is operational to prevent disrupting self-haul services provided to the public.

### Facility Summary and Regional Impact

<b>Location</b>	Metro Central Organics Hub, District 5
<b>Waste Reduction</b>	16,700 tons per year
<b>Avoided Greenhouse Gas Emissions</b>	3,100 metric tons of CO <sub>2</sub> e per year
<b>Metro Jobs</b>	2 full time equivalent
<b>Capital Costs</b>	\$30 Million (2024\$)
<b>Annual Operation/Maintenance Costs</b>	\$0.2 Million (2024\$)

Establishing reliable and equitable organics receiving facilities throughout the region will divert organic materials from landfills.



# ORGANICS

## PUBLIC-PRIVATE PARTNERSHIPS FOR ORGANICS

Metro will continue to pursue and implement different types of public-private partnerships to develop additional organics hubs in areas of the region where we have the greatest gaps for facilities that accept commercial and residential organics. The goal of partnering is to increase access and provide equitable services across the region. Examples of the types of partnerships Metro would pursue include: (1) applying for grants to invest in equipment jointly with a private facility, or (2) Metro could fund private facilities to accept organics from haulers. Example 2 could involve subsidies per ton of organics accepted or grants for equipment installation and facility upgrades. (Planning to begin in 2025.)

### Planning

The areas of the region to implement organic hub public-private partnerships were identified during the gap assessment portion of this project. Areas with the highest priority include Multnomah County and Clackamas County east of the Willamette River. Metro will begin to determine the framework for potential partnerships upon plan adoption.

### Facility Summary and Regional Impact

<b>Waste Reduction</b>	48,000 tons per year
<b>Avoided Greenhouse Gas Emissions</b>	9,100 metric tons of CO <sub>2</sub> e per year
<b>Estimated regional jobs</b>	20 full time equivalent

## COMMERCIAL TRANSFER STATIONS

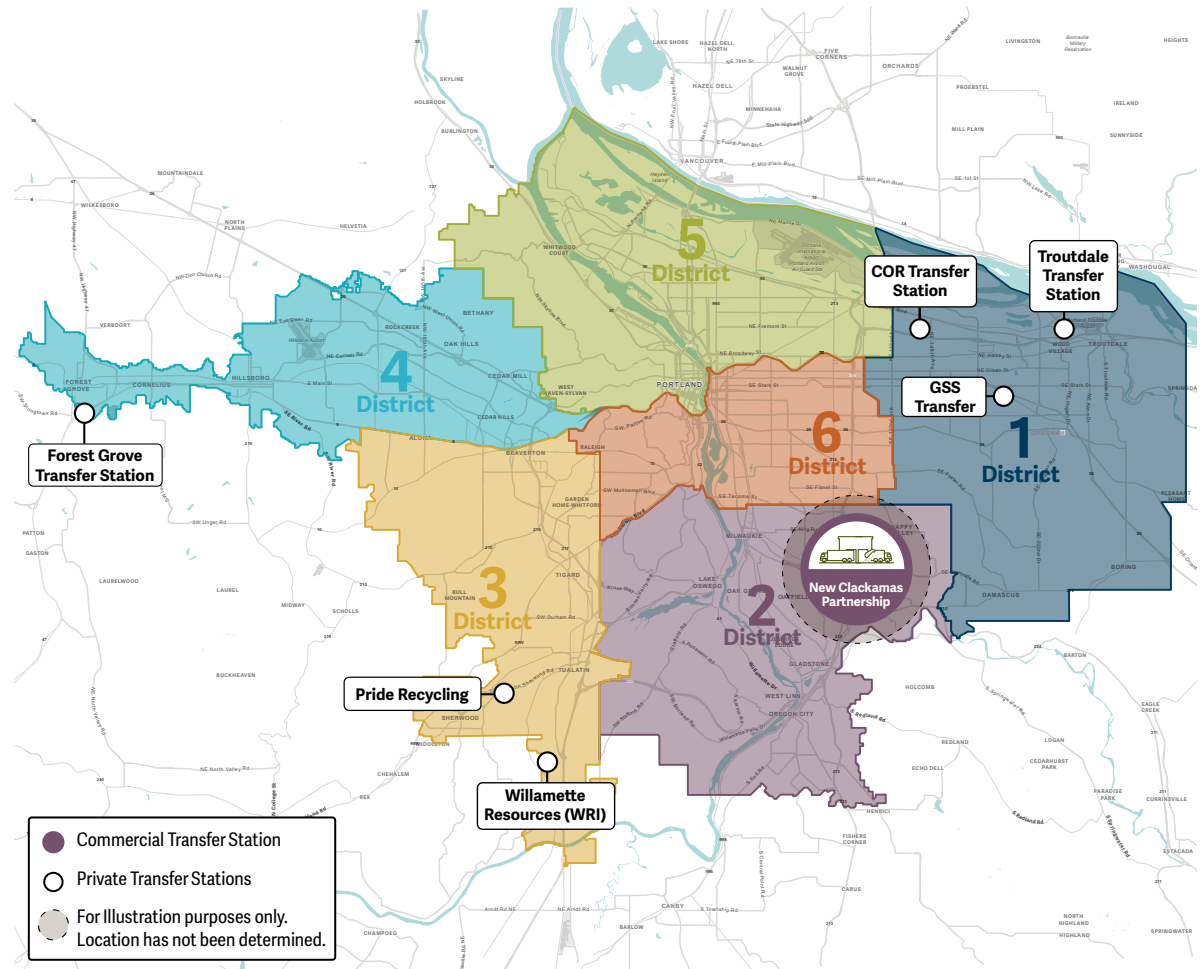
Commercial transfer stations provide important infrastructure for commercial haulers to drop off wet, dry and organic waste that is collected from residential and business customers. In this region, commercial transfer stations primarily focus on processing and transferring wet waste to landfills. Having equitable options for hauling commercial waste throughout the region is another important element of providing accessible, affordable services to the entire region.





# TRANSFER STATION INVESTMENTS

Metro will consider reducing its role in processing and transferring waste from commercial haulers at its two transfer stations to best serve the public interest. The investment strategy proposes converting Metro South to a community drop-off depot, which would create a gap for facilities that accept wet, dry and organic waste from commercial haulers in Clackamas County and parts of Portland, Washington County and surrounding areas. To account for this, Metro will take a two-phased approach to explore options to fill the gap left by converting Metro South to a community depot that serves just residential and small business customers.



Consider reducing Metro's role over time in handling waste from commercial haulers through a phased approach.



## COMMERCIAL TRANSFER STATION INVESTMENTS

If Metro proceeds with a reduced role in handling commercial waste, it will take a phased approach outlined in the following pages.

### **Phase 1: Seek to authorize a new Commercial Transfer Station**

Through a public process, Metro will seek existing private facilities interested in serving the wet waste needs of commercial haulers in the area near Metro South. Depending on the level of interest, Metro would evaluate whether to authorize one or more facilities to best meet the public interest. This option does not require Metro to build a new facility and would not increase Metro's capital costs. On the other hand, if Metro South stops accepting waste from commercial haulers, Metro's overall costs for managing the remaining waste would increase since Metro facilities would be receiving less tonnage.

Unless Metro decides to regulate rates or other aspects of private facility operations in the future, this option carries the risk that new facilities authorized to operate near Metro South may charge higher prices to customers and create gaps for haulers if they do not take other materials currently accepted at Metro South such as residential organics, wood, yard debris and construction waste. This is because Metro does not currently regulate rates at private facilities or what materials those facilities must accept from haulers.

### **Planning**

Metro will evaluate the level of interest of existing private facilities to serve commercial haulers near Metro South.

Gauge interest from private facilities to fill needed commercial transfer service in areas with gaps.



## COMMERCIAL TRANSFER STATION INVESTMENTS

### Phase 2: Develop public-private partnership to build a new facility

If Metro finds no interest from the private sector to provide commercial hauler services in the area around Metro South or determines that a proposed private facility does not meet the public interest, Metro will explore partnering with a private company to build a small commercial transfer station near Metro South. This option would allow Metro to exercise more oversight over pricing and to control how much transfer capacity is added to the system and what materials to prioritize, particularly food waste, based on gaps and hauler needs. A drawback is that this option involves a collaborative investment approach that could lead to increases in Metro's capital and/or operations costs. Conceptually, the plan assumes Metro would need to invest at least \$12 million in today's dollars to acquire land to build the new facility.

### Planning

The release of a Request for Proposals to evaluate a public-private partnership for a new commercial facility would not start until after all potential existing facilities were identified as unsuitable or uninterested in providing commercial services near Metro South. This has the potential to delay the conversion of Metro South to a community drop-off depot because commercial services at Metro South should not cease until a replacement in the region is operational.

Develop a public-private partnership to build a new commercial facility to replace Metro South without significant capital investment.



# CHAPTER 5:

## SUPPORTING POLICY ACTIONS

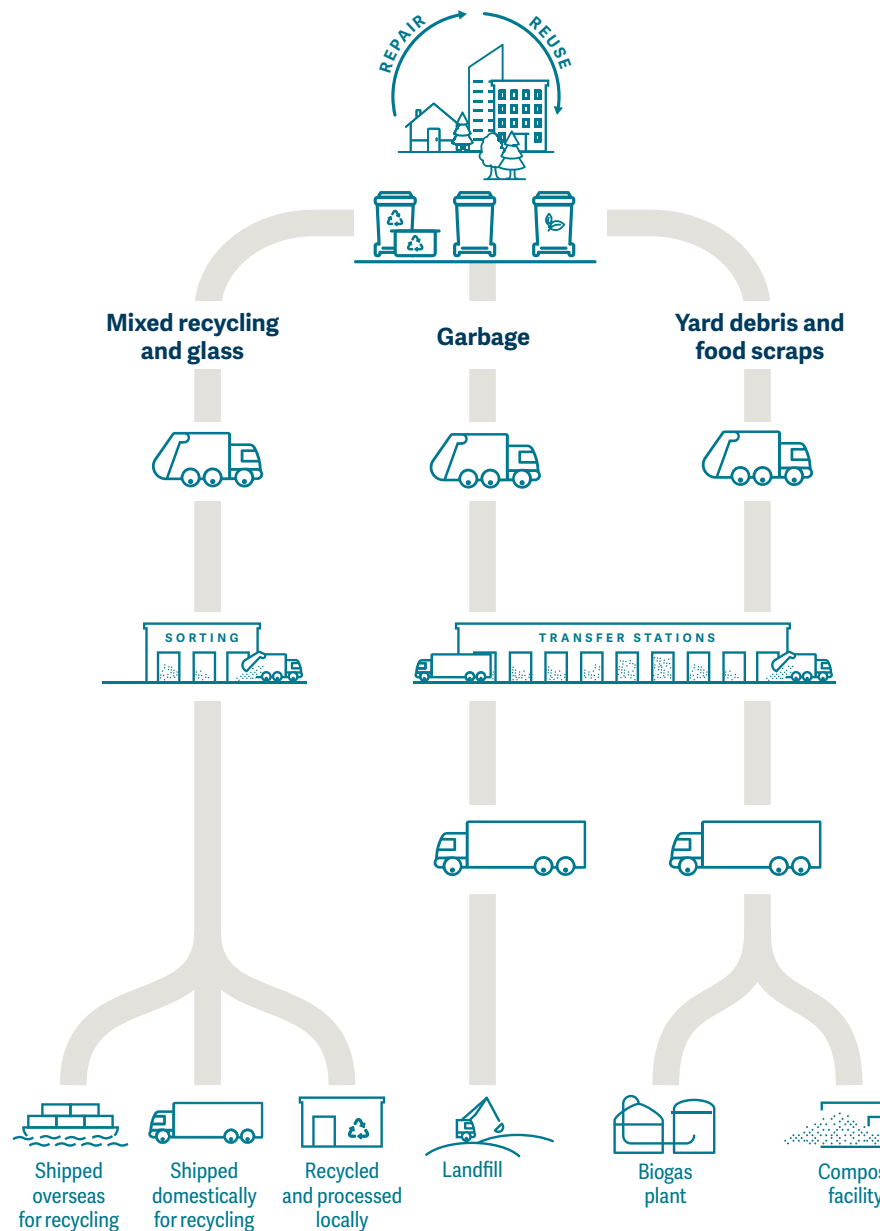


# SUPPORTING POLICY ACTIONS

## Context

Metro oversees the regional garbage and recycling system, which includes a mix of privately and publicly owned solid waste transfer stations. Since the early 1980s, Metro has operated two public transfer stations and authorized several private facilities to serve the region. Today, there are seven private and two public stations for handling wet waste and other materials within Metro’s jurisdiction. Some of the private transfer stations are owned by national waste companies that also own and operate landfills and others are locally owned and unaffiliated with landfills. In addition, some private transfer stations perform material recovery onsite, while others do not. As the solid waste authority, Metro controls how wet waste is allocated in the region between public and private transfer stations.

The Metro region generates about 2.6 million tons of waste annually, with 56 percent going to landfills and 44 percent recovered for recycling, composting or generating energy. Wet waste makes up 27 percent of the total, while dry waste accounts for 21 percent. Dry waste includes processing residues, construction debris and nonrecoverable materials. Source-separated recyclables make up 40 percent, and special waste such as remediation waste from an environmental cleanup, constitutes 12 percent. Wet waste is a significant revenue source for some private transfer stations.



Hundreds of organizations help reduce the amount of materials handled by the system

The system serves **24** cities and **3** counties

**40+** private hauler companies

**9** transfer stations (7 private and 2 public)

Transfer trucks

**40+** recycling, composting and biogas facilities

**7** landfills (in Oregon and Washington)

## SUPPORTING POLICY ACTIONS

In addition to the investment priorities that are described in this plan, there are two policy-related areas that were identified for additional analysis and discussion upon adoption of the plan:

- Wet waste tonnage flow
- Private facility regulation

These policy and regulatory areas are complex and interconnected, affecting how the plan will be phased and implemented over time. Further exploration is needed into how changes in these two policy areas will be coordinated as part of the plan's implementation.



## WET WASTE TONNAGE FLOW

Metro’s approach to allocating wet waste in the region has evolved significantly over the years. Initially, Metro allocated uniform wet waste tonnage amounts for most of the private transfer stations in the region. Dry waste was previously included in these allocations until 2002, when Metro removed limits on dry waste to promote recovery and processing across multiple facilities.

Over time, privately owned transfer stations sought larger wet waste tonnage allocations to enhance operational efficiency. Metro adjusted these allocations based on annual forecasts of population and economic growth, but there was no formal approach for these adjustments, and this led to inconsistencies.

### Current approach

In response, Metro Council directed the development of a more consistent and predictable process for allocating wet waste tonnage. This led to the adoption of the “Transfer System Configuration Policy” in July 2016 (Resolution No. 16-4716). The configuration policy established that Metro would reserve a minimum of 40 percent of the region’s wet waste tonnage for the two publicly owned stations, Metro Central and Metro South, to maintain sufficient flow for public benefit and establish a predictable and transparent framework for allocating tonnage to private stations to support the hybrid system.

The main strategies of the transfer system configuration policy are:

1. Allocate tonnage on a percentage basis to ensure flow to the public stations.
2. Limit the amount of wet waste that any one private company may transfer.
3. Ensure transparency of rates.

In 2018, Metro Council established a framework (Ordinance No. 18-1426) for a fair and transparent allocation of wet waste tonnage to private stations. In 2020, council directed staff to integrate 2030 Regional Waste Plan goals into this methodology. The current tonnage allocation program uses a combination of equal shares and goal-based shares, focusing on living wages and benefits, workforce diversity, environmental impact reduction, community investment and affordable and consistent rates.

As part of the Regional System Facilities Plan development, Metro Council identified the need to evaluate the current approach to allocating wet waste to ensure the system is optimizing waste reduction, maximizing public benefit and improving system efficiency.





# WET WASTE TONNAGE FLOW

## Policy Actions

To support implementation of the Regional System Facilities Plan, two key actions have been identified related to the wet waste tonnage flow policy area:

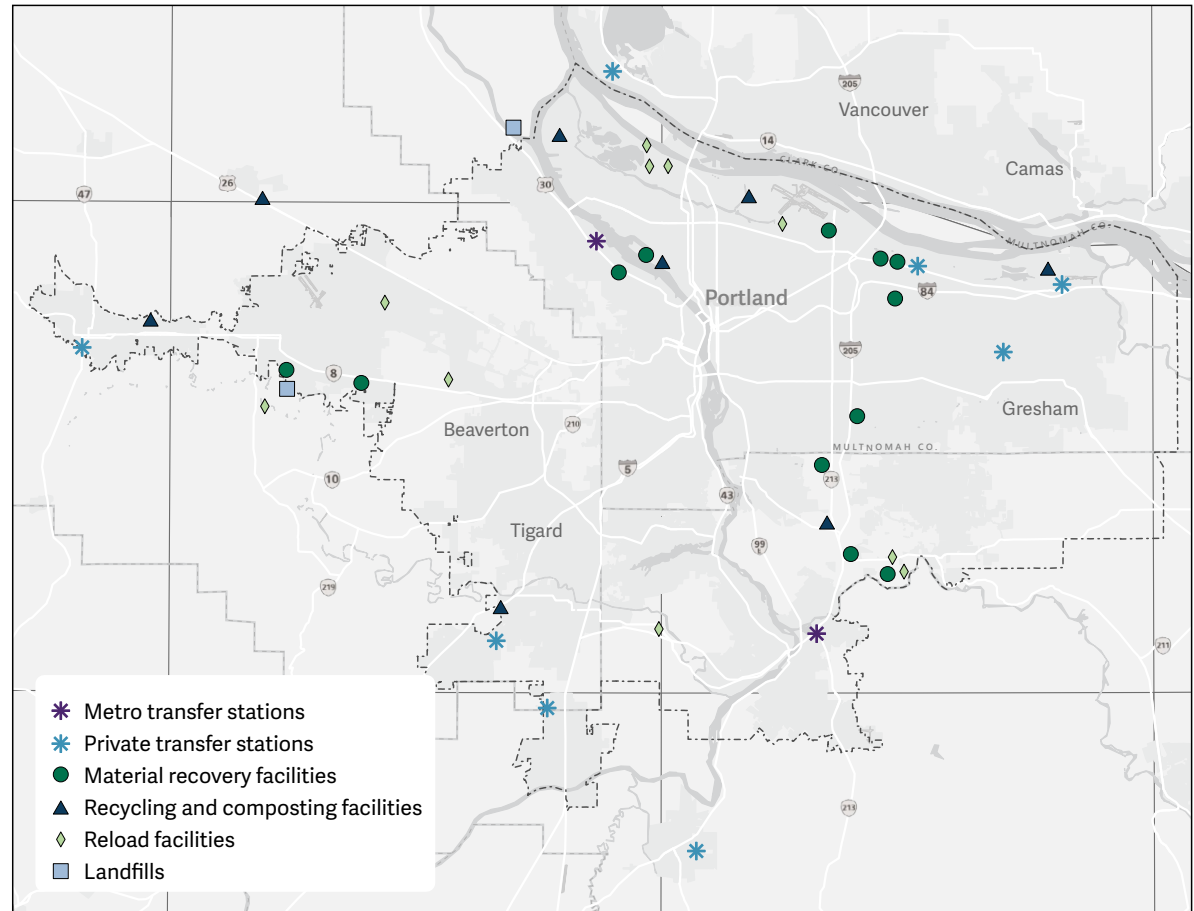
- 1. Examine the wet waste tonnage allocation program:** Evaluate options for modifying or eliminating the current wet waste tonnage allocation program. This assessment will consider the implications for the waste management system, including how changes might impact access for independent haulers, costs for customers and level of service.
- 2. Assess the Metro tonnage reserve:** Explore options for reducing or removing the amount of regional wet waste tonnage that Metro reserves for the publicly owned transfer stations. 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.



## PRIVATE FACILITY REGULATION

As the regional solid waste authority, Metro has the responsibility to ensure that all garbage and recyclable materials generated in the greater Portland area are managed in a way that protects public health and safety and safeguards the environment. Metro's responsibility and authority to manage the region's garbage and recycling system is derived from the Oregon constitution, Metro Code and Administrative Rules, Metro charter and Oregon Revised Statutes (chapter 268 and chapter 459).

The regional garbage and recycling system, as designated by Metro Council, currently includes 9 transfer stations, 31 solid waste facilities (recycling, composting, reloading), 10 landfills and other disposal sites. Metro also issues non-system licenses to authorize the transport of specific waste types to specific destinations outside of Metro's designated solid waste system. In addition, more than 40 private hauling companies operate in the region and the collection of waste is overseen by local governments.



## PRIVATE FACILITY REGULATION

Metro ensures effective waste management by overseeing the regional system, enforcing requirements and providing programs, services and facilities. Metro manages the garbage and recycling system in partnership with cities and counties to implement the 2030 Regional Waste Plan. Metro code Title V governs the requirements for garbage and recycling, or “solid waste,” generated in the region. Metro uses a variety of methods to make sure that individuals and businesses understand and comply with the region’s garbage and recycling requirements. Metro does this through education, technical assistance or enforcement, as necessary. Metro does not currently exercise all its solid waste regulatory authority such as regulating rates in the region.

As part of this Regional System Facilities Plan development, Metro Council identified an interest in evaluating options for private facility regulation. This will include exploring 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.

### Policy Actions

To support implementation of the Regional System Facilities Plan, one key private facility regulation action has been identified:

**Evaluate private facility regulation:** Explore options to maintain, modify or add regulations for private facilities to better serve the public interest. The implementation of this action will be coupled with the policy actions described in the previous wet waste tonnage flow section.





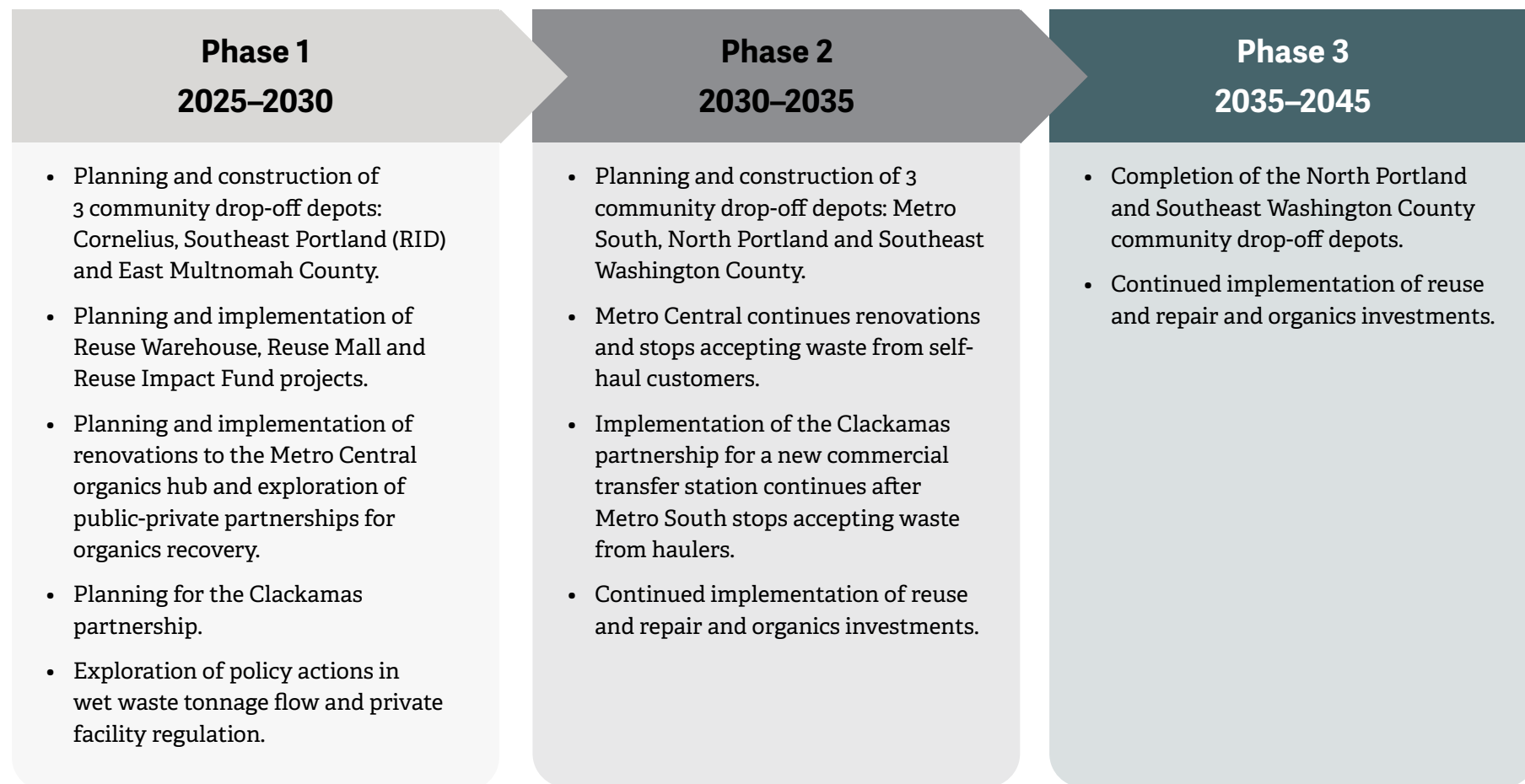
# CHAPTER 6:

## PHASING, COST AND FINANCING

## CONCEPTUAL PHASING

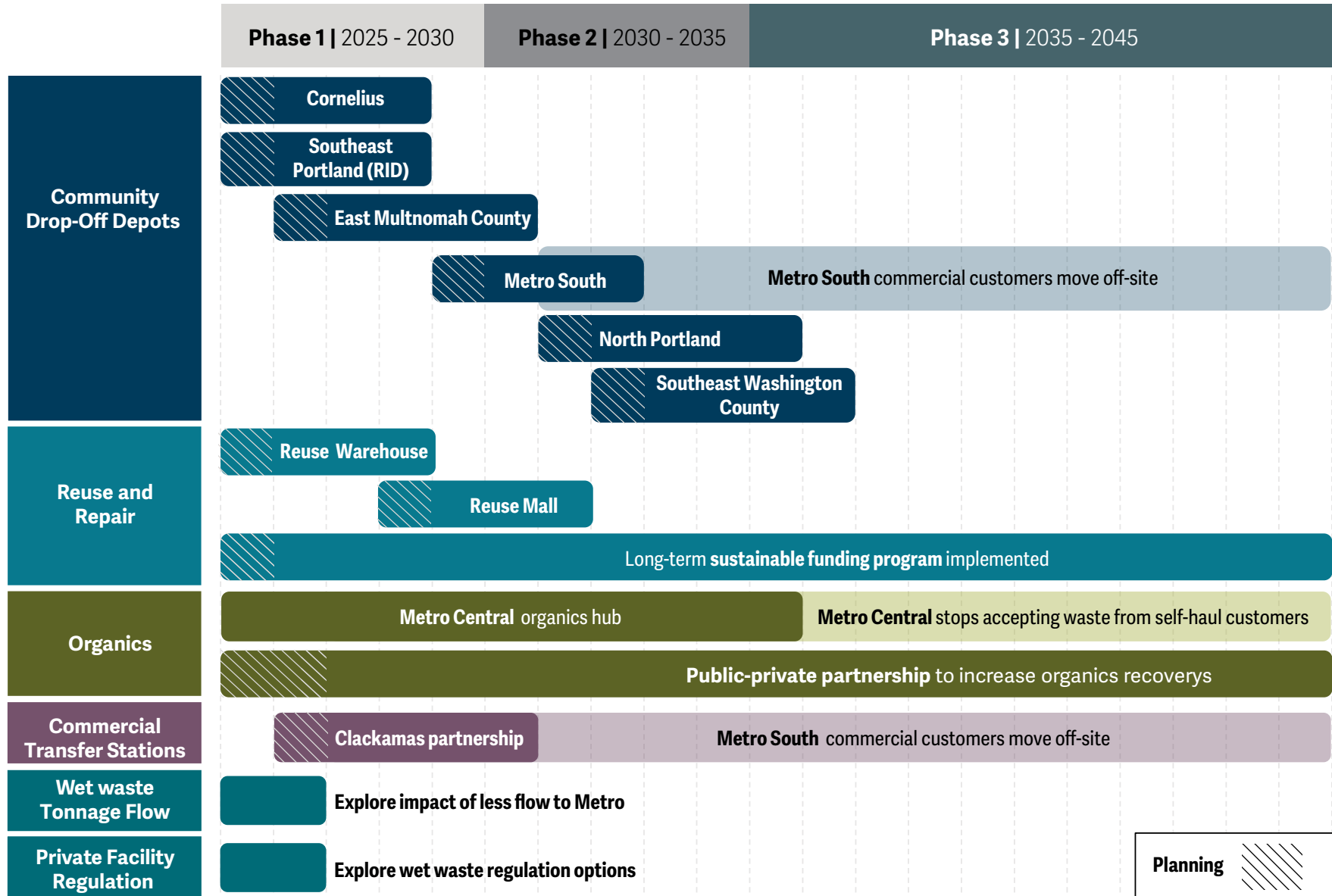
This plan envisions using a phased approach to implement new facilities and other investment projects over the next 20 years (2025-2045). Implementation of these projects will be done in collaboration between Metro and city, county, non-profit and private industry partners, with guidance and oversight from the Regional Waste Advisory Committee and other Metro Council advisory committees (see Chapter 7 for more details).

**For conceptual planning purposes only.  
Specific dates have not been determined.**



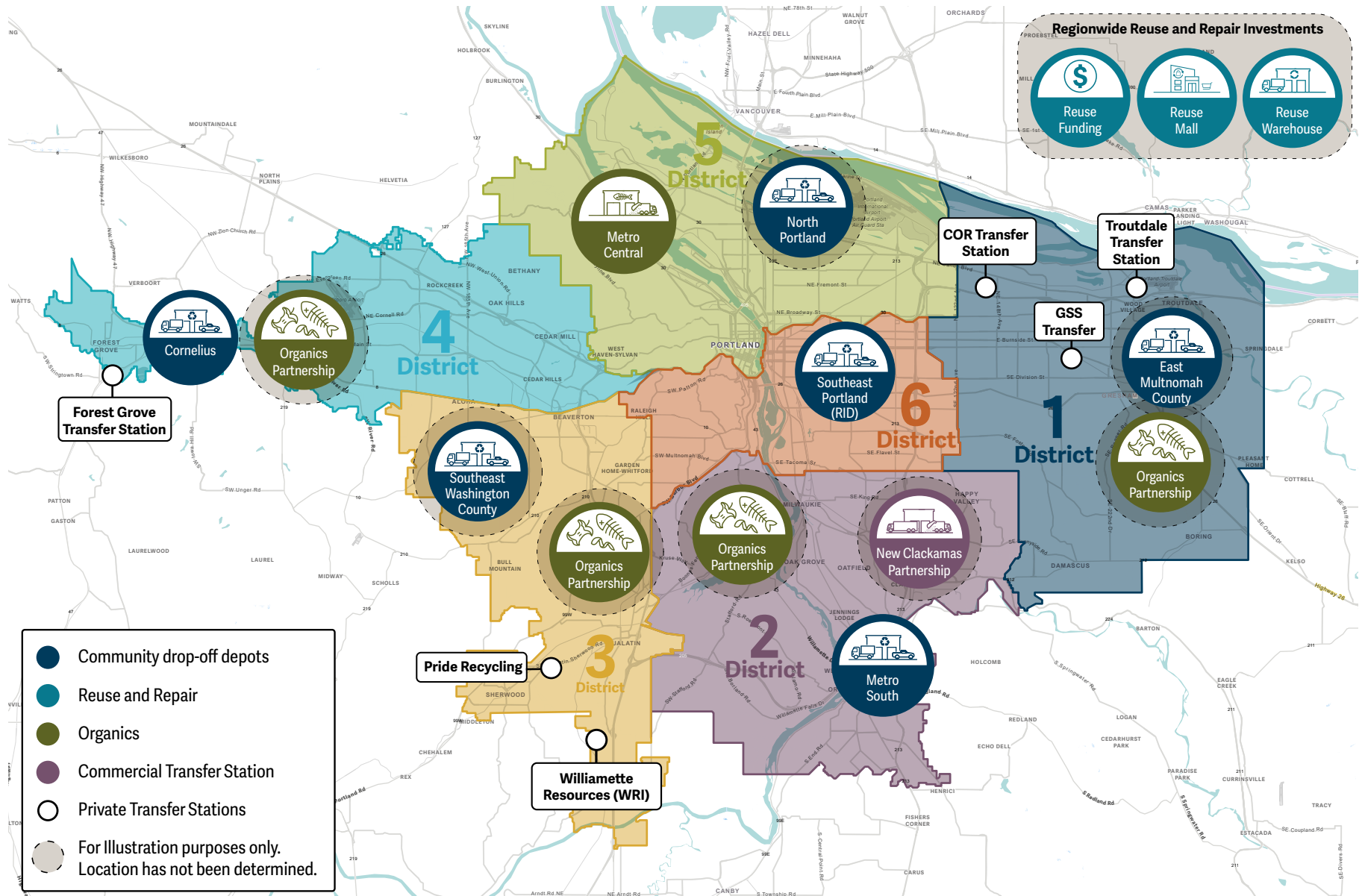
# CONCEPTUAL IMPLEMENTATION SCHEDULE (BY PHASE)

**For conceptual planning purposes only. Specific dates have not been determined.**



Planning 

# INVESTMENTS OVERVIEW



# OVERVIEW OF INVESTMENT COSTS

	<b>CAPITAL INFRASTRUCTURE PROJECTS</b>	<b>ESTIMATED CAPITAL COSTS (IN 2024 DOLLARS)</b>	<b>ESTIMATED ANNUAL OPERATIONS AND MAINTENANCE COSTS* (IN 2024 DOLLARS)</b>
<b>Community Drop-Off Depots</b>	6 community drop-off depots	\$194 million	\$48.8 million
<b>Reuse and Repair</b>	Reuse warehouse, mall and impact fund	\$37 million	\$3.5 million
<b>Organics</b>	Metro Central organics hub	\$30 million	\$0.2 million
<b>Commercial Transfer Stations</b>	New Clackamas partnership	\$12 million	N/A
	<b>TOTAL</b>	<b>\$273 million</b>	<b>\$52.5 million</b>

*Note: Refers to the annual operations and maintenance cost during the first year after each facility or program is fully operational.*

High-level cost estimates have been prepared for this plan and for initial planning purposes. Based on these estimates, the capital or construction costs for building new facilities are projected to be approximately \$273 million (in 2024 dollars). The new facilities and programs will also increase operational and maintenance costs by around \$52.5 million per year (in 2024 dollars) by the year 2045. Generally, projects will be financed through revenue bonds, with debt paid off over 20 years. Metro will also pursue grants as much as possible to offset the costs of new investments. Cost information and the financing approach will be refined as projects advance and details are further developed.

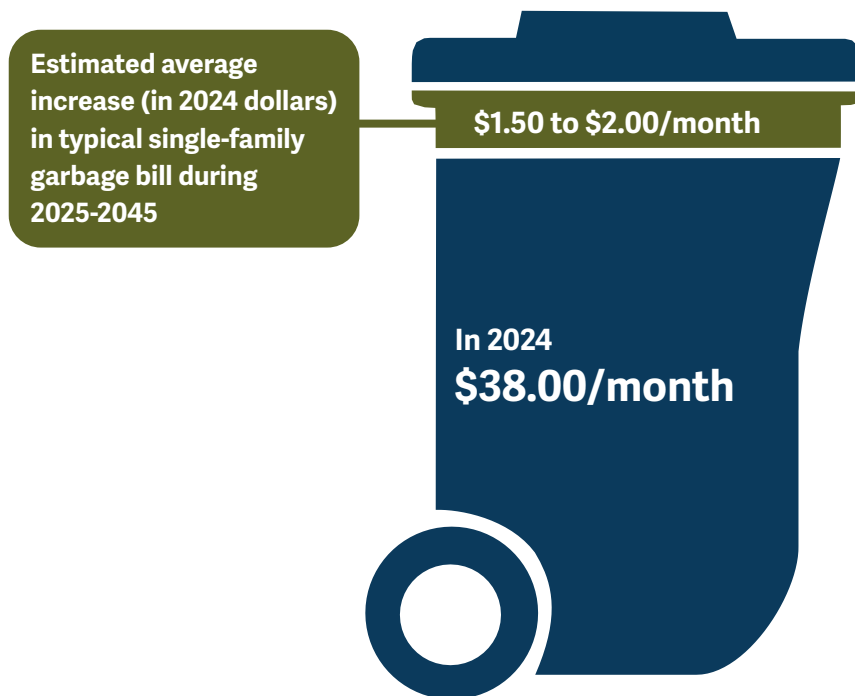
The cost impacts described here only consider how much the plan's investments are estimated to cost in the future, based on the information available today. The impacts do not account for other elements that affect Metro's costs such as new programs and policies outside this plan. They also do not incorporate factors that are outside Metro's control, including 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.



## OVERVIEW OF INVESTMENT COSTS

Phase 1 2025-2030	\$130 million
Phase 2 2030-2035	\$119 million
Phase 3 2035-2045	\$24 million

### Capital Costs by Phase (in 2024 dollars)



### Estimated impact on curbside collection costs

Building, operating and maintaining the investments in the plan will require increases to the regional system fee and Metro facility customer fees, which are expected to indirectly raise the cost of curbside garbage and recycling collection services for households and businesses in the region.

For the typical single-family household collection bill of \$38 per month today, the plan’s investments are projected to add, on average, an extra \$1.50 to \$2.00 per month (in 2024 dollars) throughout the 2025-2045 period. These estimates are based on a range of conceptual implementation scenarios modeled during development of the plan. Cost estimates and impacts will be refined as the plan is implemented. However, the actual impacts to collection bills and Metro facility fees due to increases in Metro’s capital and operational costs will depend on many factors, including how soon facilities and programs are fully in place, how much are fees allowed to increase every year based on Metro Council’s fee setting policy decisions and other factors outside Metro’s control.

## FINANCING TERMS

Under state law, Metro has the authority to issue revenue bonds to finance the construction or renovation of reuse, recycling and garbage facilities such as landfills, transfer stations and material recovery facilities, regardless of whether those facilities are located inside or outside the Metro jurisdictional boundary, according to Oregon Revised Statutes (ORS) 268.600-268.660. To implement this plan, Metro would issue revenue bonds to finance most of the capital construction costs involved with building or renovating facilities.

### **What are revenue bonds?**

Revenue bonds are a form of long-term borrowing that government agencies such as Metro use to finance programs and projects. Unlike general obligation bonds, revenue bonds do not require local government agencies such as Metro to ask voters to approve them. Revenue bonds are paid off using the revenues from fees and charges paid by customers and users. In the case of reuse, recycling and garbage facilities, Metro has two main sources of revenues that can be used to pay off the bonds: the fees charged to customers for accepting different materials and the regional system fee.

**Customer fees:** The fees Metro facilities charge customers for accepting mixed garbage, yard debris, food waste and other materials (for example, tonnage fees, fixed fees).

**Regional system fee:** A fee that is charged on every ton of garbage generated within the Metro boundary. Any private or public facility that accepts garbage generated within the Metro boundary charges customers the regional system fee. Metro uses the revenue collected from this fee to run programs and services for which customers are not charged directly, such as the household hazardous waste services at Metro facilities and collection events, and the collection of dumped garbage in public spaces.





# CHAPTER 7: IMPLEMENTATION AND MONITORING



Photo credit: Photo courtesy of the City of Burnaby, Burnaby, BC Canada

## IMPLEMENTATION AND MONITORING OVERVIEW

Metro is responsible for implementing the Regional System Facilities Plan and for monitoring performance as investment projects are planned and carried out. To implement these projects, Metro will collaborate with city, county, tribal, and state governments, as well as non-profit and private industry partners. Metro will work with these partners to search for suitable sites, permit new facilities, engage with communities who live near potential sites, and explore partnerships with existing non-profit organizations and private businesses to expand services.

As the next page describes, each investment project will require developing specific implementation plans with refined budget estimates. Once initiated, each project's implementation plan will undergo a review process involving Metro Council and the Regional Waste Advisory Committee, with opportunities for the public, tribal and local governments, non-profit and private industry partners to weigh in. There are two formal bodies that will oversee implementation of the plan, Metro Council and the Regional Waste Advisory Committee.

### **Metro Council**

Metro's seven-member directly elected council will oversee plan implementation, provide direction on the design, timing, financing and other aspects of investment projects, and make final decisions on whether to approve each project's implementation plan. Metro staff will be responsible for carrying out individual projects once they are approved by Metro Council and reporting to council periodically on the implementation of the plan.

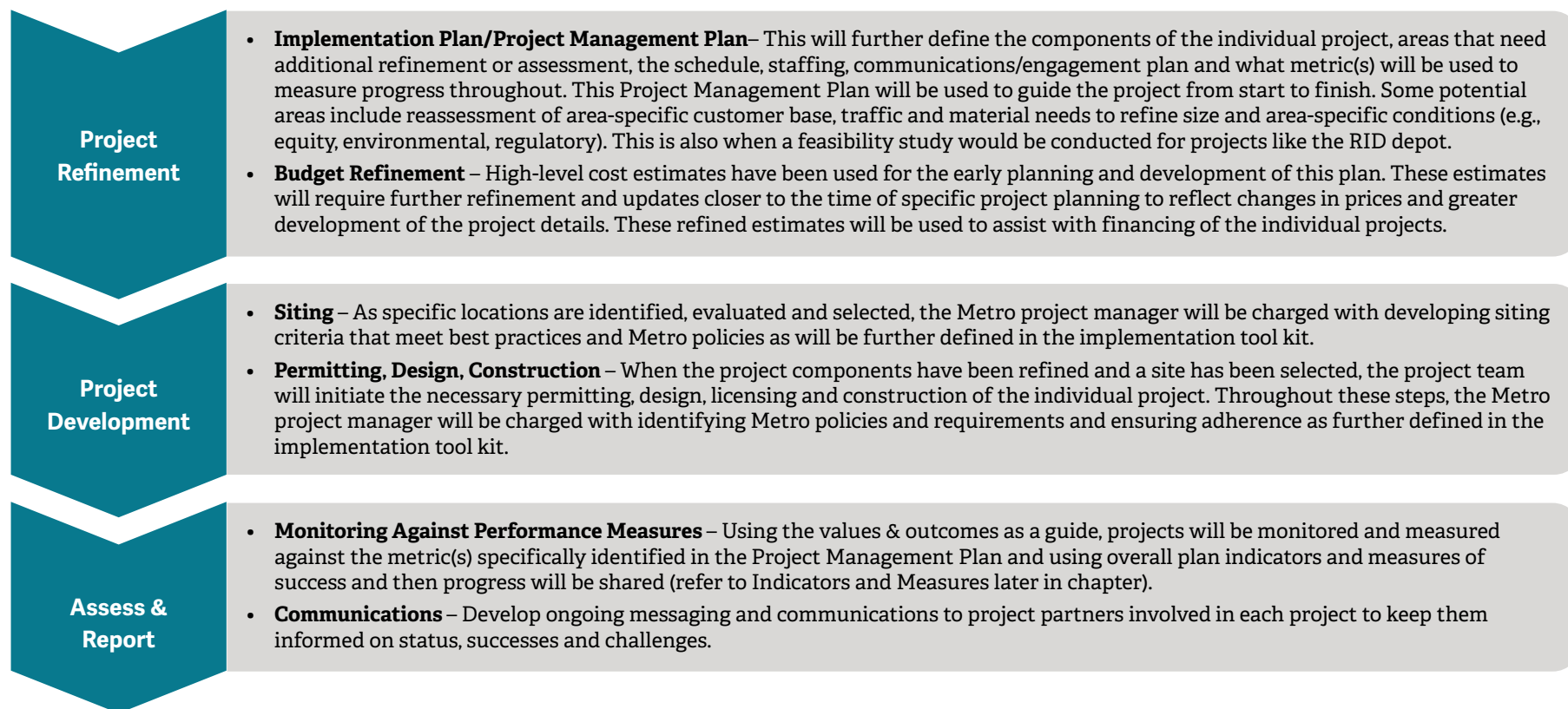
### **Regional Waste Advisory Committee**

The committee advises Metro Council on the management of the garbage and recycling system. The committee is comprised of 17 members representing cities, counties, the public, the reuse sector and the private solid waste industry. Two Metro councilors serve on the committee as chair and vice-chair. The committee is expected to provide input on the development each investment project's implementation plan and budget and provide recommendations to Metro Council.

In addition to the Metro Council and the Regional Waste Advisory Committee, Metro staff, at Metro Council's direction, may seek input from other advisory committees, including Metro's Committee on Racial Equity (CORE), the Metro Policy Advisory Committee (MPAC) and project-specific community advisory groups.

# IMPLEMENTATION AND MONITORING OVERVIEW

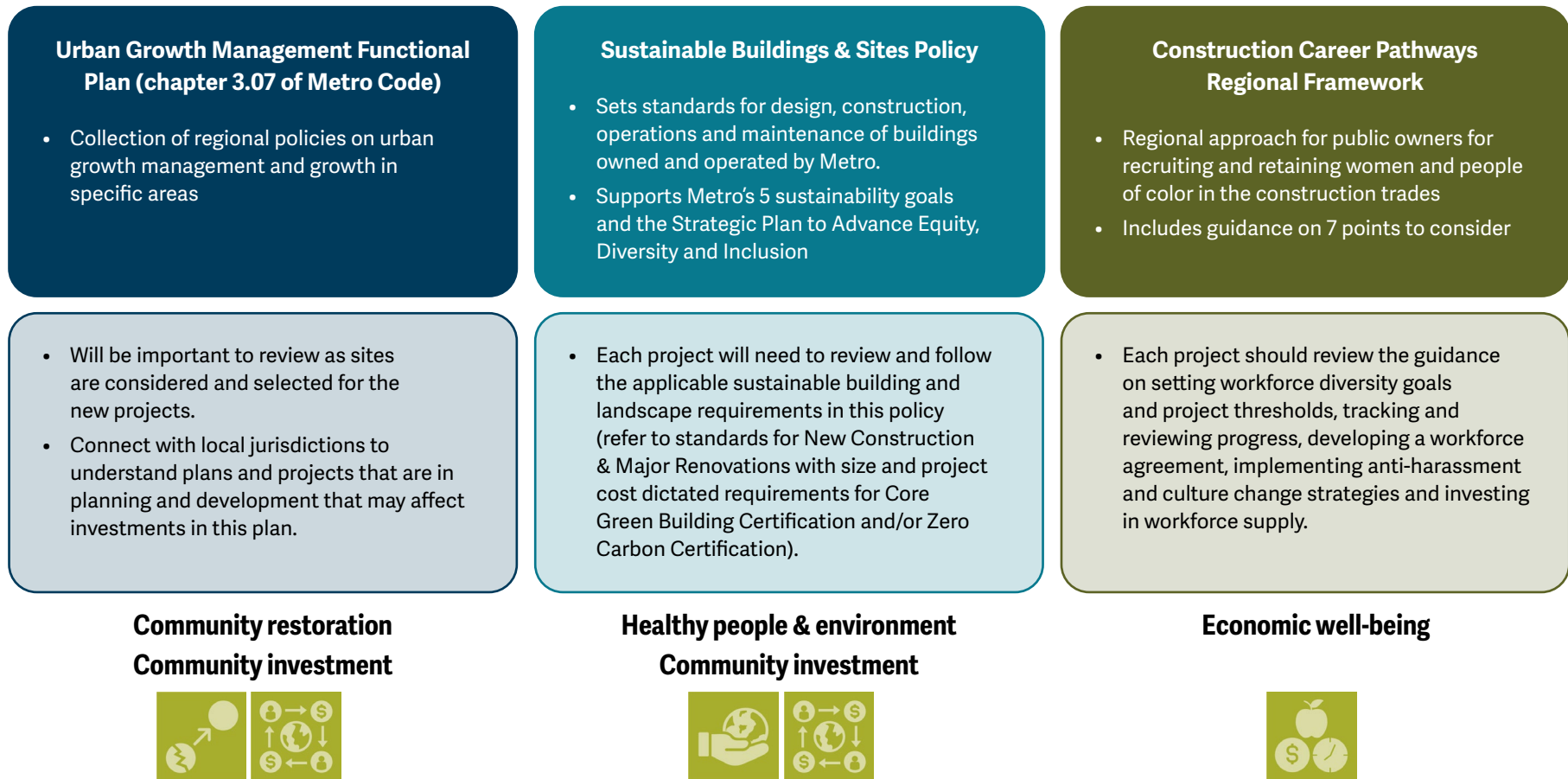
The conceptual schedule and phasing will guide the implementation of the investment strategy. Prior to initiating each facility or program investment project, a detailed project implementation plan will be prepared. This plan will detail project components, staffing, costs and specific engagement steps. All projects will include the steps described in the following sections.



# IMPLEMENTATION TOOLKIT – POLICIES

As projects are further developed, Metro will review and assess the various policies that guide where a facility can be sited, how to reduce impacts on surrounding communities, how structures are built and how facilities will be staffed. The following graphic shows three key

policies. There will be other policies that are assessed throughout the process. These policies will be included in the more detailed implementation toolkit that will be provided as a supplementary document to this plan.





## IMPLEMENTATION TOOLKIT – GUIDELINES FOR ENGAGEMENT

Engagement has been an important element throughout this project and will continue through plan implementation. Many of the foundational values and outcomes for this plan support broad engagement for the life of these projects from planning through operations. These values include promoting healthy people and environment, environmental literacy, community restoration, community partnerships, community investment, and tribal consultation (more on this later in the chapter, refer to Tribal Consultation).

When implementing a facility project in this plan, Metro will follow the project's values and outcomes as well as the guidelines for engaging the public, potential host communities, city and county representatives and other partners given in the following sources:

**Strategic Plan to advance racial equity, diversity and inclusion, 2016** – This strategic plan contains six elements (strategy; goals/objectives/actions; implementation vision; evaluation framework; analysis and decision-support tool; and relationship between racial equity, diversity, and inclusion) and provides a unified direction and additional focus for the crucial equity work currently underway at Metro, both agency-wide and in specific departments and venues.



Partners shared ideas and asked questions about plan scenarios at the symposium (September 2023).

## IMPLEMENTATION TOOLKIT – GUIDELINES FOR ENGAGEMENT

**2021 Racial Equity Framework** – This framework and accompanying worksheet should be used to help ensure that a racial equity analysis is applied when decisions about Metro’s budget and public services are being made.

**2030 Regional Waste Plan** – This plan provides guiding principles and specific actions to eliminate barriers and generate positive community benefits that advance racial equity, diversity, and inclusion.

**Metro Public Engagement Guide, 2024** – This guide provides information to enable meaningful connections and collaboration between community members, Metro staff, Metro Council, local governments, local businesses and nonprofit organizations. Metro staff, councilors and advisory committee members will use the guide along with policies across the organization to plan and carry out engagement activities. The guide strengthens Metro’s engagement practices by inviting more voices to the table to listen and learn from one another. It provides key tools, reporting guidance and best practices to Metro staff.



Metro Councilors and international panelists toured local reuse businesses as part of the symposium (September 2023).

## IMPLEMENTATION TOOLKIT – SITING CRITERIA

Specific siting criteria will be established for each project that requires purchase or lease of a new site. Criteria will be developed and reviewed with community input and documented in the project management plan. Generally, Metro will consider the plan’s values and outcomes, the policies outlined in the previous section, Metro’s community engagement guidelines, and Metro’s capital asset management plans, as well as resiliency plans, disaster debris management plans, and the lessons learned from other recent Metro siting projects, including the Future South and Future West transfer station siting projects.



Community Advisory Group members toured the Community Warehouse facility in Tualatin to learn about reuse and repair (March 2023).

### Future South Siting Project – Community Lens

The Future South Community Lens represents feedback received from the Future South community advisory group that met between August 2020 and April 2021 when Metro was looking for a site to relocate and rebuild the Metro South transfer station. While it was originally developed to guide this one project, it could be adapted for implementation of this plan. The community lens includes:

- Guiding principles
- Community criteria for property evaluation which has categories for what a possible site must-have, prefer-to-have, and would be nice-to-have
- Questions for property evaluation
- Post site selection criteria

# TRIBAL CONSULTATION

In line with Metro’s commitment to tribal consultation on key regional decisions and to build better relationships, Metro invited consultation with Tribes during plan development. Starting in Phase 1, Metro included tribal consultation in the project’s values and outcomes (refer to Chapter 2) and invited consultation with interested Tribes who have engaged with Metro in the past and have distinct historical and contemporary interests and connections to what is now known as the greater Portland area. The purpose was to seek input from Tribes during the planning process and into the future, as Metro implements new facilities and other investment projects.

## Ground disturbance risk

Building new facilities will involve ground-disturbing activities with varying levels of potential risk to cultural, historical, archaeological and natural resources important to Tribes. The table in this section lists each project in the plan and the anticipated level of ground-disturbance risk. This risk assessment is preliminary, given that all projects are conceptual until further developed and implemented.

	Project	Ground Disturbance Risk	Description
<b>Community Drop-Off Depots</b>	<b>Cornelius</b>	High	New construction on vacant lot
	<b>Southeast Portland (RID)</b>	Medium/High	Depending on feasibility, may involve renovation of existing buildings or new construction
	<b>East Multnomah County</b>	High	New construction; no site has been identified
	<b>Metro South</b>	High	Major renovation of existing facility
	<b>North Portland</b>	High	New construction; no site has been identified
	<b>Southeast Washington County</b>	High	New construction; no site has been identified
<b>Reuse and Repair</b>	<b>Reuse warehouse</b>	Low/High	Depending on availability, may involve leasing existing warehouse or new construction
	<b>Reuse mall</b>	Low/High	Depending on availability, may involve leasing existing warehouse or new construction
	<b>Reuse impact fund</b>	Low/Medium	Funding program, does not involve direct construction
<b>Organics</b>	<b>Metro Central</b>	Medium/High	Renovation of existing facility
	<b>Public-private partnerships</b>	Low/High	Funding program; may range from equipment upgrades to facility improvements
<b>Commercial Transfer Stations</b>	<b>New Clackamas partnership</b>	Medium/High	May involve modifications to existing private facilities or new construction

*Note: The risk levels in this table will be adaptively managed by Metro staff in partnership with interested Tribes to reflect real-time priorities and conditions of proposed projects and actions. Metro’s Tribal Affairs Program will maintain the most up to date risk ratings.*

## TRIBAL CONSULTATION

### Tribal consultation and resource protection going forward

During plan implementation, Metro will continue to seek input on individual projects from interested Tribes, focusing on identifying locations for potential new facilities where the geographic location has yet to be determined and on additional actions that can be taken to enhance resource protection in facility construction, operations and maintenance.

Tribes and Metro will also have opportunities to advance shared priorities in other areas, including addressing climate change, improving access to services for tribal members living in the greater Portland area, honoring the cultures and histories of Pacific Northwest Indigenous Peoples and identifying opportunities for partnership with tribal enterprises. Metro also looks forward to learning from the expertise Tribes have as owners and operators of their own solid waste facilities and systems where lessons learned and best practices can inform Metro's work.

### Resource protection guidelines

For each project in the plan, Metro will follow a set of guidelines and best practices developed in coordination with Metro's tribal affairs program and informed by input from Tribes. Key elements will include:

- Allocating budget for historic and cultural resources compliance and clearance review expenses
- Instructions and resources for conducting site surveys and assessing potential impacts
- Developing site-specific inadvertent discovery plans
- Ensuring compliance with existing local, state and federal laws and regulations that pertain to cultural, historic, archaeological and natural resources. This includes the Oregon statewide planning goal 5 (Oregon Administrative Rule 660-015-0000(5)), Archaeological Objects and Sites (Oregon Revised Statutes 358.905 to 358.961), Indian Graves and Protected Objects (Oregon Revised Statutes 97.740 to 97.760), Protection of Publicly Owned Historic Properties (Oregon Revised Statutes 358.653), and the National Historic Preservation Act and Archaeological Resource Protection Act.



Tribal leaders and staff discuss opportunities to protect natural resources at a Metro Parks and Nature site visit

## INDICATORS & MEASURES

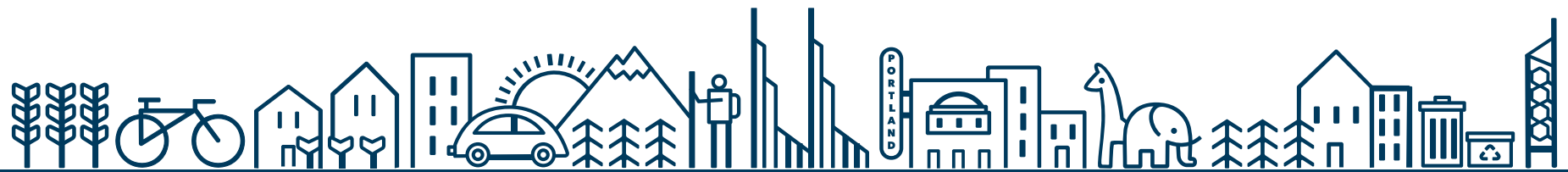
The plan includes indicators to measure performance as investment projects are implemented over time and shared in future Regional Waste Plan progress reports and other channels.

The plan will use the indicators noted in the following table.

Area	Indicator	Description
Waste reduction & environmental impact	Tons of waste recovered for reuse, recycling or composting and associated avoided greenhouse gas emissions	Indicator related to Regional Waste Plan goals 6 and 10 that captures the increase in tons of waste recovered because of the plan's new investments and their associated greenhouse gas emissions, compared to the baseline.
Driving access to public self-haul facilities	Percent of the population within a 20-minute drive to the nearest public self-haul facility, by material type	Regional Waste Plan indicator for Goal 16 that tracks driving access to facilities that accept materials from the public for reuse, recycling or disposal.
Driving access to commercial facilities	Percent of the region's area within a 20-minute drive to the nearest commercial facility, by material type	Regional Waste Plan indicator for Goal 16 that measures driving access to facilities that accept materials from franchised/licensed haulers.
Affordability	Changes in the regional system fee, Metro tonnage charges and the average garbage and recycling bill	Indicators that track changes in cost over time associated with the plan's new investments, compared to the baseline.







- Art and events
- Garbage and recycling
- Land and transportation
- Parks and nature
- Oregon Zoo

[oregonmetro.gov](http://oregonmetro.gov)



Materials following this page were distributed at the meeting.



# Regional System Facilities Plan

Summary of public input and proposed plan revisions

Metro Council Work Session

December 17, 2024

# Today's discussion

- Present public input and proposed plan revisions
- Seek Council approval on revisions and referral to the Regional Waste Advisory Committee



# Regional outcomes

ENVIRONMENT

STRATEGIC TARGET



**Meeting our Climate and Resilience Goals**

Waste prevention and healthy environment

**Excellent, accessible and resilient garbage and recycling system**

ECONOMY

STRATEGIC TARGET



**A Resilient Economy for All**

Shared prosperity



Metro South Facility Opens in 1983



James Recycling Event September 2024

# Regional System Facilities Plan

- Sets 20-year vision and blueprint for investments to improve the reuse, recycling and garbage system
- Focused on waste reduction, increased access, and affordability
- Identifies areas where more study, analysis and discussion are needed



# Plan phases and engagement

## Phases



## Partner Engagement

PHASE 1	PHASE 2	PHASE 3	PHASE 4 and 5
<ul style="list-style-type: none"> <li>• Community Advisory Group</li> <li>• Metropolitan Mayors' Consortium</li> <li>• Regional Waste Advisory Committee</li> <li>• Committee on Racial Equity</li> <li>• Metro Policy Advisory Committee</li> </ul> <p><b>Roundtables with:</b></p> <ul style="list-style-type: none"> <li>• Local governments</li> <li>• Reuse organizations</li> <li>• Private industry</li> </ul>	<ul style="list-style-type: none"> <li>• Community Advisory Group</li> <li>• Regional Waste Advisory Committee</li> <li>• Committee on Racial Equity</li> <li>• Metro Policy Advisory Committee</li> </ul>	<ul style="list-style-type: none"> <li>• Community Advisory Group</li> <li>• Metropolitan Mayors' Consortium</li> <li>• Regional Waste Advisory Committee</li> <li>• Committee on Racial Equity</li> <li>• Metro Policy Advisory Committee</li> </ul> <p><b>Roundtables with:</b></p> <ul style="list-style-type: none"> <li>• Local governments</li> <li>• Reuse organizations</li> <li>• Community organizations</li> </ul> <p>International Symposium Private industry interviews</p>	<ul style="list-style-type: none"> <li>• Community Advisory Group</li> <li>• Metropolitan Mayors' Consortium</li> <li>• Regional Waste Advisory Committee</li> <li>• Metro Policy Advisory Committee</li> <li>• Clackamas County Coordinating Committee</li> <li>• Washington County Coordinating Committee</li> <li>• City and County presentations</li> </ul> <p><b>Roundtables with:</b></p> <ul style="list-style-type: none"> <li>• Local governments</li> <li>• Reuse organizations</li> <li>• Private industry</li> </ul>



# Engagement by the numbers

20

Community  
Advisory  
Group  
Meetings

12

Regional Waste  
Advisory  
Committee  
Meetings

6

Metro Policy  
Advisory  
Committee  
Meetings

5

Committee on  
Racial Equity  
Meetings

12

Industry  
interviews

**More than 40 meetings with Metro's advisory committees**

# Plan outline

- Introduction
- Values and outcomes
- Existing system and gaps
- Investment strategy
- Supporting policy actions
- Phasing, cost and financing
- Implementation and monitoring



# Draft plan - key investments



**Community drop-off depots**  
Building six new depots for reuse, recycling, hazardous waste, compost and self-haul garbage services



**Reuse and repair**  
Funding local reuse and repair businesses and building a regional reuse warehouse and a reuse mall



**Organics**  
Converting Metro Central into a regional hub for food waste and yard debris and investing in local private organics facilities



**Commercial transfer stations**  
Partnering with private facilities to provide more infrastructure for garbage from commercial haulers

# Draft plan review



- Public comment period Oct. 1 to Nov. 6
- Public comment period and survey
- Community conversations
- Local government presentations

[www.oregonmetro.gov/facilitiesdraftplan](http://www.oregonmetro.gov/facilitiesdraftplan)

# What we heard

There is a critical need for westside and eastside public services, including household hazardous waste  
*- local government administrators*

Support for staffed community depots that can assist customers, provide job opportunities, support emerging reuse businesses  
*- Adelante Mujeres workshop participant*

Support Metro's focus on regulatory oversight and minimize competition with private waste services  
*-private industry*

Support for a network of depots that are affordable, prioritize reuse and repair and provide educational resources and opportunities  
*- community advisory group themes*

Concern about cost impacts to implement plan and desire for more transparent and predictable fee-setting  
*-city councilor*

Ensure geographic and cost equity in the commercial transfer of wet waste and the region's organics system  
*- local government staff*

Provide stable, long-term funding to support local reuse and repair businesses –  
*reuse and repair business owner*



# What we heard: key themes

1. Strong support for building a network of community drop-off depots.
2. Coordinate with partners to site, program and operate new facilities.
3. Start implementing projects where people lack services.
4. Improve and promote existing facilities.
5. Waste reduction is a priority.
6. Focus on cost and affordability.



# Proposed changes to draft plan

## Chapter 3: Existing System and Gaps

- Add description of existing public recycling facilities and define self-haul
- Include additional information on the Recycling Modernization Act (RMA) and its connection to the plan

## Chapter 4: Investment Strategy

- Revise community depot strategy to include partnerships that leverage existing facilities where possible
- Prioritize building the East Multnomah County depot in Phase 1 (move North Portland depot to Phase 2)
- Add information on the “food waste reduction hierarchy” to the organics strategy section

## Chapter 6: Finance and Phasing

- Change the conceptual phasing, implementation schedule and costs to prioritize East Multnomah County depot
- Add the estimated annual operations and maintenance costs of the investments to provide more cost detail

## Chapter 7: Implementation and Monitoring

- Add details on how Metro will collaborate with partners on project planning and implementation, as well as the role of the Regional Waste Advisory Committee and Metro Council in advising and overseeing the plan

# System Facilities Plan referral

Staff recommends referring the revised draft plan to the Regional Waste Advisory Committee to ask:

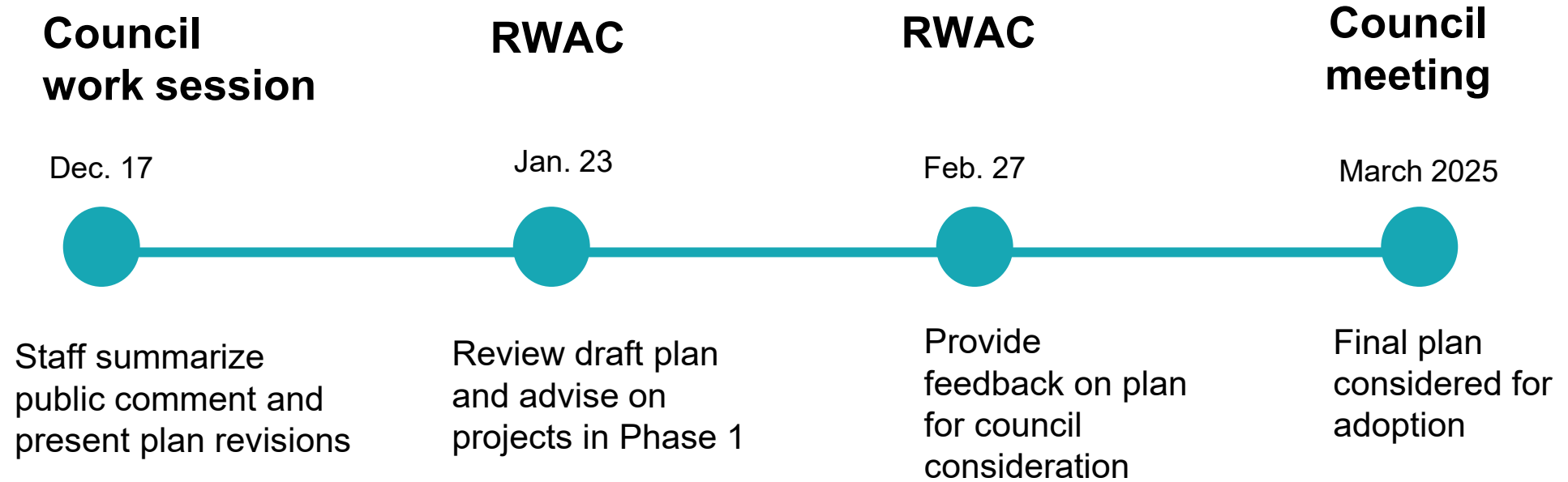
- Do you have feedback on the sequence of the projects proposed in Phase 1?
- Do you have feedback or additional comments for Metro Council as they deliberate on adoption of the plan?

## Phase 1 2025–2030

- Planning and construction of 3 community drop-off depots: Cornelius, Southeast Portland (RID) and East Multnomah County.
- Planning and implementation of Reuse Warehouse, Reuse Mall and Reuse Impact Fund projects.
- Planning and implementation of renovations to the Metro Central organics hub and exploration of public-private partnerships for organics recovery.
- Planning for the Clackamas partnership.
- Exploration of policy actions in wet waste tonnage flow and private facility regulation.



# What's next: timeline to finalize plan



# Discussion questions

- 1) Does Council support the revisions to the draft plan?
- 2) Does Council support referring the plan to the Regional Waste Advisory Committee to collect additional feedback before adoption?



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