

Public comment report

Attachment 1 to Staff Report for Resolution No. 25-5526



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Background

Adoption of Resolution No. 25-5526 will authorize the Chief Operating Officer to issue a renewed solid waste facility franchise to Waste Management of Oregon, Inc. to operate Forest Grove Transfer Station (FGTS) for a term of five years.

On August 8, 2025, the applicant submitted to Metro a complete solid waste facility franchise application accompanied by payment of the appropriate application fee of \$500. The applicant did not request any changes to its current authorization.

Public notice and opportunity to comment

Metro posted a public notice and invited public review and comment on the franchise application. The notice was posted to Metro's website and postcards were mailed to approximately 132 property owners and residents within one-quarter mile of the facility. Metro also emailed the notice to 253 community-based organizations, neighborhood associations, local governments, solid waste industry members, and other interested parties.

The 30-day public comment period began on August 15, 2025, and closed on September 15, 2025. Metro received five comments about the proposed franchise renewal and shared them with FGTS. Metro redacted all personal identifying information prior to providing the comments to the applicant and relevant jurisdictions including the City of Forest Grove regarding noise and traffic concerns. FGTS declined to provide a response to public comments.

Summary of written public comments on application

The five public comments received are included below, starting on page #3. and are summarized into two categories:

1. Convenience and Cleanliness

- Appreciation for bulky waste collection events and desire for increased frequency and household hazardous waste collection events.
- Facility is orderly and clean

2. Livability and offsite impacts

- Noise from trucks and equipment
- Odors affecting nearby neighborhoods
- Risks of pest activity
- Incompatibility with historical residential neighborhood and proximity to recreation and natural areas
- Public health and environmental concerns
- Outgrowth of original scope

Metro's Responses:

1. Convenience and cleanliness

- Appreciation for bulky waste collection events and desire for increased frequency and household hazardous waste collection events
- Facility is orderly and clean

Metro response#1 – Convenience and cleanliness

Public comments including this submission are appreciated and considered as part of staff's analysis and recommendations.

2. Livability and offsite impacts

- Noise from trucks and equipment
- Odors affecting nearby neighborhoods
- Risks of pest activity
- Incompatibility with historical residential neighborhood and proximity to recreation and natural areas
- Public health and environmental concerns
- Outgrowth of original scope

Metro response#2 – Livability and offsite impacts

Metro is responsible for planning, managing and overseeing the region's solid waste system. It has an obligation to the public to ensure that the waste intended for reuse, recycling and other purposes is handled properly and sent to appropriate markets, and that all other waste is safely managed and disposed.

Metro and Oregon Department of Environmental Quality (DEQ) regulate FGTS and closely monitor the facility to ensure it meets applicable regulatory requirements. Metro routinely performs inspections at the facility to monitor compliance and coordinate with other regulatory agencies including DEQ and the City of Forest Grove to address and resolve compliance issues.

The proposed solid waste franchise includes requirements for the facility to control and minimize off-site impacts. In particular, the proposed franchise requires the operator to meet performance standards in three areas:

1. **Environment:** The franchisee must design and operate the facility to avoid undue threats to the environment including, but not limited to, stormwater or groundwater contamination, air pollution and improper acceptance and management of hazardous waste, asbestos and other prohibited wastes.
2. **Health and safety:** The franchisee must design and operate the facility to avoid conditions that may degrade public health and safety including, but not limited to, fires, vectors, pathogens and airborne debris.
3. **Nuisances:** The franchisee must design and operate the facility to avoid nuisance conditions including, but not limited to, litter, dust, odors and noise.

Additionally, the proposed franchise carries forward a requirement that the facility operate in a manner that is not conducive to harboring rodents, birds, insects or other vectors and that controls and minimizes the generation of detectable odors. If vectors are present, the proposed franchise requires the facility to implement vector control measures. FGTS contracts with a licensed pest control company which currently services the facility every other week as part of its proactive prevention and control strategy.

The proposed franchise also includes a requirement that the facility operate in a manner that controls and minimizes the generation of odors that are detectable off-site as described in the

Public comment report

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facility operating plan including routine site maintenance, e.g., sweeping, and moving putrescible waste offsite within 24 hours of receipt

The facility is zoned as general industrial (GI) by the City of Forest Grove and the use of the property to conduct activities defined in the proposed franchise are permitted outright. According to the City of Forest Grove, the FGTS is located in a “General Industrial Zone” and holds the necessary land use approval for a transfer station operation. Metro relies on local governments, like the City of Forest Grove, to determine land use compatibility within their respective jurisdictions. Metro also relies on local governments to evaluate and address traffic concerns.

FGTS obtained its first Metro solid waste facility franchise in 1985 and has been operating at the current location since that time. Since that time, the amount of waste that the facility receives each year has significantly declined.

The facility plays an important role in the region’s solid waste system and provides transfer capacity on the west side of the region. The solid waste system is currently comprised of two publicly owned facilities and six privately owned transfer stations within the region. FGTS is the only privately owned transfer station that currently accepts public self-haul customers.

During the current franchise term (January 1, 2020 to December 31, 2025), the City of Forest Grove’s Code Enforcement reported receiving one noise complaint in 2022 and no traffic related complaints. The noise complaint investigation found A-weighted decibels (dBA) levels were in compliance with local noise regulations at that time and no action was taken. In July 2022, Metro received one noise complaint from a local resident related to a natural gas compressor onsite. FGTS staff were notified of the complaint and responded to the complainant detailing operational changes and efforts to evaluate the facility property lines to add landscape to create a buffer.

In addition to performing routine site inspections, Metro investigates facility complaints and works with facility operators to address issues and concerns that arise. The public can share feedback, including complaints to Metro using its [Solid waste facility complaint form](#). The public may also report concerns to DEQ, the City, or directly to the facility operator, DEQ and City of Forest Grove have reported to Metro that there are no current enforcement or compliance issues associated with this site. The applicant is well known to Metro as an operator of a Metro-franchised solid waste facility and staff concludes that the applicant is qualified to operate and manage this facility in a competent and efficient manner.

The following comments were received as part of the public comment period verbatim. Comments are listed in the order they were received:

Comment #1

“I live about a block away from the facility. When I moved here I worried that I might be able to smell the facility, especially in the summer. This has not been the case, so thank you. The facility operates special events for customers, which is great except lines of cars always form for hours down B Street. I suggest you have the events more often since they are popular. Thanks for all the good work you do handling our waste. It may not be glamorous but i appreciate having an important service just work well.”

Comment #2

Public comment report

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"We're grateful to have a transfer station nearby that is orderly and clean. We are always appreciative of bulky waste day twice a year and believe it keeps junk off roads. Would love to see a hazardous waste day quarterly."

Comment #3

"I considered a move to Old Town, but the long hours of constant beeping from the trucks caused me to stay in my current neighborhood. Are there any plans to consider moving the transfer station to a more industrial area?"

Comment #4

"To Whom It May Concern,

We, the undersigned residents of Forest Grove, respectfully request that the renewal of the Solid Waste Facility Franchise at its current location not be approved. Our community strongly opposes this renewal on the grounds of incompatibility with the surrounding land use, detrimental impacts on quality of life, and the long-term harm to our historic neighborhood, environment, and recreational resources.

1. Incompatibility with Historic Residential Neighborhood

The facility is located directly adjacent to Old Town Forest Grove, a neighborhood of historic homes that hold cultural, architectural, and community significance. No other regional transfer stations of this scale are located in such close proximity to historic residential areas. The visual intrusion of industrial operations into this historic district erodes the character of our neighborhood and contributes to property devaluation.

2. Outgrown Original Scope

When the facility was first permitted, it served only a handful of local trucks within the City of Forest Grove. Over the years, it has grown far beyond its original scope. Today, it appears to accommodate dozens—if not over one hundred—garbage trucks daily, many of which serve areas far outside Forest Grove, including routes toward Portland. This significant expansion has dramatically increased industrial traffic through our community streets and created impacts never intended or approved when the facility was first introduced.

3. Traffic, Noise, and Odor Impacts

Residents experience daily disturbances from heavy truck traffic, loud mechanical operations, and recurring odors. These nuisances diminish the health, safety, and peaceful enjoyment of our homes. Such conditions would be unacceptable in any residential setting, and especially in one with historic preservation at its core.

4. Proximity to Community Recreation and Natural Assets

The facility directly abuts the B Street Trailhead, the gateway to a beloved network of scenic community trails used for hiking, recreation, and outdoor enjoyment. This trailhead is a natural escape for residents and visitors alike, yet it is overshadowed by truck noise, odors, and the industrial presence of the transfer station. Allowing this industrial use to persist in such close proximity to a community recreational asset undermines both the value and the purpose of these public trails.

5. Public Health and Environmental Concerns

Transfer stations bring risks of litter, pest activity, odor emissions, and exhaust exposure. Locating such a use adjacent to residential homes and public trails places undue health burdens on families, children, and seniors who live, walk, and recreate nearby. These are risks that should be mitigated by proper siting in an industrial or non-residential zone—not in the heart of a neighborhood.

6. Precedent and Planning Principles

Other Metro-area transfer stations are carefully located in industrial zones, separated from historic neighborhoods and recreational corridors. The Forest Grove facility is the exception, not the rule. Continuing to allow this land-use incompatibility undermines established planning principles, damages the character of Forest Grove, and sets a troubling precedent for permitting industrial expansion into residential areas.

Conclusion: The Facility Has Outgrown Its Welcome

This transfer station may have been tolerable when it served only our city. However, as its operations have grown, its impacts have multiplied, and it has clearly outgrown its welcome. Our community urges decision-makers to deny the renewal of this franchise at its current location and require relocation of the facility to a more appropriate industrial site, away from historic homes and recreational assets.

Old Town Forest Grove is a cherished and historic neighborhood. The B Street Trailhead is a vital community resource. Both deserve protection from incompatible industrial encroachment. For the health, safety, and quality of life of our residents, we respectfully ask that you deny this renewal request and begin the process of relocation.

Respectfully submitted”

Comment #5

“I don't oppose the waste transfer station in its current location, however I would like to see a higher priority on smell mitigation. Sometimes the stench of rotting garbage wafts over to my house, which is a block away. It seems like this happens primarily on the weekends, in the summer, although this could be because that's when I'm more likely to be out in my yard. I would appreciate a more frequent hosing down of the storage containers, as that's where I assume the smell is originating.”