

# Public comment report

Attachment 1 to Staff Report for Resolution No. 25-5525



December 5, 2025

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## Background

Adoption of Resolution No. 25-5525 will authorize the Chief Operating Officer to issue a renewed solid waste facility franchise to City of Roses Disposal & Recycling, Inc. (COR) for an initial one-year term and Metro Council may extend the term for up to an additional four years based on the results of a compliance evaluation.

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 125 property owners and residents within one-quarter mile of the facility. Metro also emailed the notice to 254 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 seven comments about the proposed franchise renewal. Metro redacted all personal identifying information, and then shared the comments with COR and relevant jurisdictions including: City of Portland regarding noise concerns, Portland Bureau of Transportation (PBOT) regarding traffic concerns, and Oregon Department of Environmental Quality (DEQ) regarding air pollution concerns. COR Transfer Station also provided a written response to the public comments that Metro received (see page 4).

## Summary of written public comments on application

The public comments that Metro received are included in full in this report beginning on page 5. In general, the comments raised concerns in the following two categories:

### 1. Livability and offsite impacts

- Odors affecting nearby neighborhoods
- Noise from trucks and equipment
- Air pollution and health risk concerns from traveling dust plumes caused by grinding materials
- Visibility of operations and wood stockpiles from offsite
- Increased traffic and safety risks
- Historical burden in East Portland
- Proximity of a transfer station to residential areas

### 2. Safety and community resources

- Concern about risk of hazardous materials in construction debris
- Request for complaint resources and data

## Metro response #1 – Comments about livability and offsite impacts

The facility is located in an industrial zone and has obtained the requisite land use approval from the City of Portland. The facility is subject to the City's land use determinations and other zoning

and permitting requirements including noise and traffic allowances. Metro relies on, and coordinates closely with, local and State agencies to ensure comprehensive oversight of facility operations. Staff shared the input that Metro received during the public comment period related to noise, air quality, and traffic concerns with the applicable regulatory agencies including DEQ, the City of Portland's Property Compliance Division and Bureau of Transportation.

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 is committed to effectively monitoring and regulating solid waste facilities to ensure that waste is properly managed and to minimize impacts on neighboring properties. Metro routinely performs inspections at the facility to monitor compliance and coordinate with other regulatory agencies, including DEQ and City of Portland, to address and resolve any issues identified.

The proposed solid waste franchise carries forward 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 requirements that the facility operate in a manner that controls and minimizes the generation of odors, dust blowing off the premises, and minimizes any noise sufficient to cause adverse off-site impacts. As described in the operating plan, control measures include performing most waste activities inside the transfer building, using misting systems to suppress dust and odors, sweeping paved areas daily, and maintaining vegetative buffers along the southern and western edges of the property to enhance screening and reduce visual impacts.

In Spring 2024, COR worked with the City of Portland Bureau of Environmental Services' (BES) Tree Program to complete a project adding 70 fast growing trees along the southern and western edges of the COR Transfer Station property to supplement previously planted arbor vitae. Tree selection and placement decisions were made by City of Portland BES Tree Program's program manager and considerations made during the selection process included drought and heat tolerance, nativity to the area, predominantly evergreens over deciduous, and denseness of foliage. The addition of the fast-growing trees planted will help to reduce visibility of operations from the road, buffer noise from facility operations and minimize dust traveling across Sandy Blvd. The City of Portland's Property Compliance Division reported no environmental noise cases were filed

during the current term of the COR Transfer Station franchise (August 14, 2019 to December 31, 2025).

The proposed franchise carries forward requirements that the facility provide access roads of sufficient capacity to accommodate all on-site vehicular traffic, including parking, and maintain access roads to allow the orderly egress and ingress of traffic during facility operation. The franchisee must also take reasonable steps to remind persons delivering solid waste to the facility that vehicles must not park or queue on public streets or roads except under emergency conditions or as provided by local traffic ordinances. The City of Portland reported there is no history of land use or building permit compliance issues related to the facility. In addition, the City has not conducted any new traffic analysis or other findings related to the facility.

This facility is located at a site that was previously occupied by several industrial, commercial, and waste related businesses since 1959. The City of Portland granted conditional use approval for the proposed waste related activities in this industrial zone. The site was formerly occupied by Oregon Recycling Systems which operated a material recovery facility from 1995-2016. COR selected this site for its industrial zoning between three freight heavy streets and its historical use as a solid waste facility. The site has undergone significant site improvements under COR's ownership.

Solid waste facilities in the Metro region, such as COR Transfer Station, are required to collect a community enhancement fee of \$1 on each ton of putrescible solid waste they receive. The purpose of this fee is to pay for rehabilitation and enhancement projects in areas surrounding the site. COR has been collecting the enhancement fee since 2019 for grant programs that award funds for use in the surrounding community. The grant review committee is led by Elevate Oregon, which is a youth-led committee, which selects funded projects each cycle. On average over the past few years, COR has collected approximately \$120K annually as part of [Metro's community enhancement grant program](#). In 2024, COR also began collecting an additional \$1.00 for each ton of non-putrescible waste at the facility as part of a Metro tonnage allocation program.

## **Metro response #2 – Comments about safety and community resources**

The proposed franchise prohibits acceptance of hazardous waste. The proposed franchise also requires COR to screen for unacceptable materials through documentation review prior to acceptance at the transfer station visual screening of each load. If prohibited materials are received inadvertently, the facility must properly handle the material, document the load, and notify the customer. COR is responsible for managing all waste received at the facility as described in an approved operating plan. Metro's inspectors regularly monitor compliance and collaborate with other regulatory agencies, including DEQ and the City of Portland, to provide comprehensive oversight.

The proposed franchise carries forward requirements that the operator log and respond to all complaints in a timely manner. The franchisee must also maintain complaint log entries for one year and make them available to Metro. In response to public comments submitted during this comment period, on October 31, 2025, COR launched a new publicly accessible customer portal where comments and complaints can be submitted directly to COR by visiting <https://cordr.com/comments-concerns/>.

In addition to performing routine site inspections, Metro investigates facility complaints and works with the operator to address issues and concerns that arise. The public can share feedback,

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including complaints, to Metro using an online [Solid waste facility complaint form](#). The public may also report concerns to DEQ, the City of Portland, or directly to the facility operator.

In October 2022, Metro received one odor complaint from a local resident related to COR, and the facility reported receiving seven complaints from three individuals that month. The franchisee reported that it followed up with the concerned individuals, increased the percentage of odor neutralizer in its misting system, and performed increased odor monitoring surveys. Metro also increased odor monitoring during that time.

DEQ and City of Portland reported to Metro that there are no current enforcement or compliance issues associated with this site.

## **COR Transfer Station's response to public comments**

"Thank you to the community for taking the time to succinctly address concerns with COR's solid waste facility franchise renewal application. We recognize the inherent challenges of businesses operating within industrial zoning that is located adjacent to residential zoning. This joining of zoning types is seen throughout the Sandy corridor, where we are located, and continues west down Lombard. As such, we strive to exceed regulatory requirements to mitigate any impacts from our operations on to our adjoining neighbors.

Industrial operations often necessitate the use of heavy machinery, which can be a cause of nuisance noise. Knowing this, COR is proud to note that per the City of Portland Permitting & Development Bureau, there have been no recorded noise complaints within half a mile of our facility, nor have any noise complaints been received directly by COR, within the past year. Additionally, to aid in the creation of a visual and noise barrier, COR has recently planted 70 fast growing trees along the southern and western edges of the property to supplement the existing arbor vitae. Regardless, COR will continue to monitor and reduce noise generated by our operation where possible.

Over the past several years, COR has made numerous upgrades to its dust suppression and odor-neutralizing misting system, ensuring that both systems are in compliance with Metro regulations. Incorporating feedback from our neighbors, COR will continue to pursue new and innovative solutions to better accommodate our surrounding community stakeholders.

COR strives to be a steward of our community and welcomes further dialogue with community members. We wish to engage directly with community members with complaints, both to explain our operation and pursue solutions that allow us to coexist in east Portland. COR will be instituting an online comment portal at [cordr.com](http://cordr.com) to provide the community with an easily accessible portal to relay comments, complaints, and concerns.

COR takes great pride in operating within the Argay Terrace Neighborhood. We hear the comments coming from our neighbors and we will continually strive to make this neighborhood better, in collaboration with this community."

## **Public Comments**

Comments are listed verbatim and in the order they were received.

### **Comment #1**

"Hi - I'm writing to oppose the renewal of the COR Transfer Stations application. As a resident in the

Argay neighborhood, which is right across Sandy Blvd to the south, this station is problematic in many ways. It's noisy. Trucks are backing up and their back up beeps are heard early in the morning EVERY DAY. For those who live right across the street, it is very loud. The traffic of the trucks. This station is off of Sandy Blvd, a stones throw from a busy Costco, and a new warehouse facility, and a busy rail road route (which slows/stops traffic often). The large trucks that come and go from the facility have to navigate all the traffic on NE 138th Ave. This station also produces a lot of dust. I've driven through dust traveling from the bays while I'm traveling home on Sandy Blvd. It travels right across Sandy Blvd to the apartments and restaurants across the way. This station would be better off moving to an area where it is easier (safer) for its trucks to come and go more easily and it's away from a large residential area."

### **Comment #2**

"I live in the large apartment complex directly across the street from the facility. I was here for the initial approval in 2019 too. I think the facility creates a worrying amount of air pollution so close to so many people, including lots of families with children. You can see a cloud of particulates on a regular basis. I hope Metro investigates the air pollution for safety before approving the renewal application."

### **Comment #3**

"The City of Roses Disposal and Recycling Facility is a permitted facility within the City of Portland's General Industrial Zone (IG2). How a Municipal Recycling Facility (MRF) within an Industrial Zone came to be located literally across the street from a Residential Zones (RM1, R7, RMP), including a housing tract that has been there for over 40 years, is the story of East Portland and the City's disregard for it.

However, simply because it is a permitted use does not give license to Metro, the County or the City to disregard the pollution concerns of the immediate residential neighbors. As the picture featured on Metro's own Public Notice flyer soliciting comments on COR's franchise renewal application shows, the bays where the material is loaded and unloaded are open and face to the south towards Sandy Blvd and residences. Given a southerly wind or an inversion zone, odors and particulates from the material in those bays drift across Sandy towards people's houses and apartments in spite of COR's assertion that they have adequate controls in place. In addition to the putrescible and non-putrescible stored within the bays, there is also a large wood bunker that can reach 15' in height, and often does. When that wood material is being grinded or otherwise recycled, a large plume of wood debris and particulates can be seen in spite of COR's statement that they dampen the wood to reduce that pollution. Again, given wind and inversion conditions that air-borne material drifts across Sandy Blvd to the residential neighbors across the street.

The last thing I'd like to mention is the inadequacy of the vegetative buffers along Sandy that should provide a visual barrier as well as a buffer to help mitigate odors that escape the facility. A quick drive down Sandy Blvd makes it obvious that the barrier in no way provides a visual screen or could serve as a pollution sink. Of course, it does take time for trees and other shrubs (e.g., arbor vitae) to grow, but quicker growing plants could have been used had the idea of a buffer been taken seriously. As it is, COR could build a wall/screen along Sandy Blvd to screen the facility until such time as the plants reach the appropriate height and spread.

It would also be helpful to ease residents' concerns about the pollution impacts of COR if Metro would provide air quality data from random inspections. Simply assuring the public that there is no cause for concern rings hollow without supporting data. Or perhaps Metro could request that COR



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release the complaints they have accumulated over the last 5 years, which they say they have kept, so the public could see what the concerns are and how they have been addressed.”

## **Comment #4**

“I walk west on Sandy Blvd from my home on 147th ave and the smell from this facility on week-ends especially on three-day week-ends is horrible in summer. There is a year-round dust problem year-round. 503 475-2132”

## **Comment #5**

“The COR facility does not manage the dust or smell from their facility like they have written their agreement to do so. You can see (and cough through) the dust multiple times a week. I’ve called a few times for smell and everyone acts like it is impossible for the smell to come from their facility. Yet, we walk or drive by on sandy and it’s clear as day.

We need this facility to CARE and do what’s right without us having to contact them to uphold their agreement. There also needs to be stronger repercussions when they do not do so and they leave neighbors to fight yet another fight for clean air.

Please refrain from renewing their permit until they have a better system to ensure they follow rules and pre written agreements.”

## **Comment #6**

“Hello,

The City of Roses waste facility is the only putrescible waste transfer station in the METRO system that is next to homes. While the use is allowed by right it is reasonable to expect the operator and METRO to be aware of the extraordinary location of the facility and conscious of the potential health and livability impacts this facility has on neighbors. It would be helpful for METRO to consider, by placing the only putrescible waste facility next to neighbors in one of the most diverse neighborhoods in Portland, that it has an obligation outlined in its 2030 Regional Waste Plan principles to the neighborhood. Specifically - Community Restoration: “Take action to repair past harms and disproportionate impacts by the regional solid waste system.” It will come to no Portlander’s surprise the demographics of neighbors where this facility operates. METRO’S Regional Waste Plan principles would assure the surrounding neighbors that robust measures are being taken to limit “disproportionate impacts” when considering the permitting of this facility. Below are outlined instances where METRO could choose to follow its own principles and improve impacts for neighbors.

The narrative found in the COR permit application does not correspond to the lived experience of those who live next to the facility.

### **Attachment B - Facility design and Plan**

3.d. “ An evergreen hedge has been planted along the Southern boundary of the site. The fencing and hedge help contain litter, reduce noise and block the potential for unsightly conditions.”

While there are evergreen plantings as required by City of Portland zoning, to say that it helps to reduce noise and blocks unsightly conditions is not what neighbors to the facility experience. An example of the evergreens can be found in the attached photo. As can be clearly seen it is not helping to block ...unsightly conditions. The bays where processing takes place face south and are

open. The bays directly face the apartment homes across the street. The hedge neither helps in blocking potential unsightly conditions, noise nor not act as a robust barrier to dust and particles.

### Attachment C - Operating Plan

c. ii. Watering. "...eliminate dust generation on site that could potentially spread to neighboring properties." This is not a true statement. Wood dust is not eliminated through the system in place. Wood dust from the property can be regularly seen when wood grinding is taking place. As can be seen from pictures of the facility - the woodpile is in the far southern area of the facility closest to homes. The grinding takes place on the far southern end of the property closest to where neighbors live. There have been numerous incidents when the wood grinding results in wood dust/particles that are clearly visible when driving along Sandy Blvd. This dust and particles travels to nearby homes when there is a wind in the appropriate direction, when trains pass and kick up the fallen dust and when there is an inversion layer. If there is a robust system in place repeat incidents of seeing the dust would not be possible.

Other dust does come from the facility as seen in the attached photo taken September 9, 2025 - 1:25p. This is clearly dust traveling across the facility and not the mist that is often seen from the interior roof of the building that is part of the odor minimizing operation. To hazard a guess this is dust from concrete being loaded in dumpsters. Again, the placement of this is in the Southernmost area of the property closest to homes.

Other concerns: Despite this facility being next door to where people live it is left to the "knowing" of the operator for assurance that construction materials being recycled are not hazardous. If you look at the wood pile in google maps for 2024, there is clearly visible paint. What are the assurances for the surrounding community that the content of that paint is safe once it becomes dust and travels outside the facility? As outlined in COR's operating plan the best practices are "extremely important our operations do not generate negative outputs to our neighbors and public." Yet, beyond complaints from neighbors there appears to be no monitoring of negative outputs beyond the facilities boundaries.

As y'all are the experts, welcome any suggested remedies for the above outcomes. From a layman's view - more robust monitoring of the facility by METRO would be appreciated.

Here are some suggestions:

More robust systems to manage dust from wood and concrete so it does not travel off premises.

A higher evergreen hedge along the southern boundary that truly does act as a barrier as outlined in the operation plan.

An easily accessible way for neighbors to file complaints with the company and METRO. A mailing with such information to the surrounding neighbors in various languages.

METRO robust monitoring of construction debris.

This facility is the only putrescible waste transfer station next to homes, where people live. This is a METRO permitted facility. METRO can help neighbors, ensuring this extraordinary placement of this facility has minimal impact on nearby homes and the health of the people who live there. Of course we all want good jobs for our regional economy but those jobs should not come with disproportionate health and livability impacts to neighbors.

Sincerely,

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Lin Felton

PS: ignore references to attached photos as this does not appear possible in the comment form.”

## Comment #6a

Metro staff contacted commentor #6 to request for inclusion the images intended to be submitted as part of this public comment. The photos were taken by an Argay neighbor and descriptions are included below.



*Image 1, 6a – Photo to illustrate concerns of unsightly conditions in plain view, taken from Sandy Blvd. facing NE toward COR Transfer Station on September 9, 2025 at 1:25 p.m.*



*Image 2, 6a – Photo to illustrate concern of the woodpile location on the southside of the facility, taken from the northside of Sandy Blvd. facing N toward COR Transfer Station on October 30, 2025 at 4:55 p.m.*



*Image 3, 6a – Photo to illustrate concern of dust traveling across the facility, taken from Sandy Blvd. facing NE toward COR Transfer Station on September 9, 2025 at 1:25 p.m.*

## Comment #7

“From the Argay Terrace Neighborhood Association Board

The City of Roses waste facility is the only putrescible waste transfer station in the METRO system located directly next to homes. While this use is allowed by right, it is reasonable to expect the operator and METRO to recognize the extraordinary placement of the facility and to be mindful of the potential health and livability impacts it creates for neighbors.



By choosing to locate the only putrescible waste facility next to one of Portland's most diverse neighborhoods, METRO has an obligation - outlined in its 2030 Regional Waste Plan principles - to the surrounding community. Specifically, under Community Restoration: "Take action to repair past harms and disproportionate impacts by the regional solid waste system."

It will come as no surprise that the demographics of the neighbors where this facility operates reflect communities historically burdened by such siting decisions. METRO's Regional Waste Plan principles should reassure neighbors that strong measures will be taken to prevent disproportionate impacts when considering the permitting of this facility. Below are several examples where METRO could follow its own principles and improve outcomes for the surrounding community.

The narrative in the COR permit application does not match the lived experience of neighbors.

#### Attachment B – Facility Design and Plan

3.d. "An evergreen hedge has been planted along the southern boundary of the site. The fencing and hedge help contain litter, reduce noise and block the potential for unsightly conditions."

While there are evergreen plantings, as required by City of Portland zoning, they do not function as described. As shown in the attached photo, the hedge does little to block unsightly conditions. The bays where processing occurs face south and are fully open, directly facing apartment homes across the street. The hedge does not reduce noise, block views, or act as a barrier to dust and particles.

#### Attachment C – Operating Plan

c. ii. Watering. "...eliminate dust generation on site that could potentially spread to neighboring properties."

This statement is not consistent with lived experience. Wood dust is not eliminated. When grinding occurs, dust is regularly visible, including from Sandy Blvd. The woodpile and grinding activity are located at the far southern end of the property—closest to homes. Dust travels to nearby residences when the wind shifts, when trains pass and stir it up, or when an inversion layer holds it down. If a robust system were in place, these repeated incidents would not occur.

Additional dust is generated from other operations. For example, in the attached photo taken September 9, 2025 at 1:25 p.m., dust is seen traveling across the facility—clearly not the mist from odor control systems. This appears to be dust from concrete loading. Again, this activity occurs at the southernmost part of the property, closest to homes.

Other discrepancies: The application map lists the wood bunker as a 15' maximum pile height, but Google Maps imagery from 2025 shows the pile well above 15 feet.

Other concerns: Although this facility operates directly next to homes, assurance that recycled construction materials are non-hazardous is left to the operator's "knowing." For example, in Google Maps imagery from 2024, paint is clearly visible on the woodpile. What assurances exist that this paint is safe once ground into dust and released into the air? The COR operating plan states: "It is extremely important our operations do not generate negative outputs to our neighbors and public." Yet beyond neighbor complaints, there appears to be no external monitoring of negative outputs beyond the facility's boundaries.

As you are the experts, we welcome suggested remedies for these outcomes. From a neighborhood perspective, increased METRO oversight would be deeply appreciated.

We respectfully request:

- More effective systems to control dust from wood and concrete, preventing it from traveling off-

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site.

- A taller, more substantial evergreen hedge along the southern boundary that functions as a true barrier.
- An accessible and visible way for neighbors to file complaints with both the company and METRO, including a mailed notice in multiple languages.
- Robust monitoring of construction debris by METRO.

This is the only putrescible waste transfer station sited next to homes, where people live. Because it operates under a METRO permit, METRO has the ability to ensure this extraordinary placement comes with minimal impact to nearby homes and the health of residents. We all value good jobs for our regional economy, but those jobs should not come at the expense of disproportionate impacts on neighboring families.

Sincerely,  
Argay Terrace Neighborhood Association"