



November 25, 2020

Re: Comments on Proposed Revisions to Metro Code Chapter 5.10

Thank you for the opportunity to provide public comment on the proposed changes. Our comments, questions, and concerns are addressed below.

**Administrative Rule 5.15 – 2025:**

#3: This service standard rule requires weekly collection of recycling. Five of the jurisdictions that Pride Disposal services have every other week recycling collection. Metro recently did a study finding that every other week recycling had similar outcomes to weekly recycling in terms of effectiveness. One less weekly pick-up also results in reduced GHG, neighborhood and arterial truck traffic, and reduced costs to ratepayers. I understand that 5.15 – 2035 allows any programs existing as of January 1, 2019 to continue, but there is no reason that a jurisdiction should be prevented from moving to an every other week program if that local jurisdiction chooses to do so. As every other week recycling programs have been proven, by Metro, to be equal to weekly programs, this requirement should not be in place. Local jurisdictions should have the ability to choose the program that is best for their rate payers.

**Administrative Rule 5.15 – 2045:** I understand and appreciate the desire for color coding throughout the system for better clarity for customers, but I do have several concerns about this path forward:

- There will be a large cost on the system to color code containers across the region. For metal containers, this will involve repainting all recycling containers. For plastic roll carts, this will involve replacement of carts that typically last for 20+ years. We even have some carts that have been in use for 30 years. This equipment has already been paid for by rate payers and Metro would be requiring rate payers to pay for refurbishment and/or replacement of containers on an accelerated schedule, which will cause rates to increase. While I understand the receptacles can be recycled, the recycling mantra of “Reduce, Reuse, Recycle” is a hierarchy with “Recycle” being the lowest priority in terms of importance. You are asking haulers across the region to prematurely discard thousands of receptacles across the region. Additionally, recycling of plastic roll carts has a cost associated with it, which will be borne by the rate payers. We have proposed on multiple occasions that a better path forward would involve color coding of lids, rather than color coding the entire receptacle. This is a more cost effective and far less wasteful change that would still achieve the color coding that is desired.
- When I submitted this comment back in October, the response addressed the potential cost of replacing plastic carts but not metal containers. In further discussion with Metro staff it was explained to me that there was no analysis done regarding the cost of replacing or repainting

metal containers vs. replacing the lids only. This is an important piece of information that should be part of the analysis and should be made clear to Metro Council as well as local governments.

- I still maintain that choosing orange for the glass bin color is a mistake. Across the region, glass is primarily put in yellow bins or red bins. It would be far more logical, environmentally friendly and cost effective to choose one of these 2 colors so not every bin across the entire region has to be changed. I would propose analysis be done on how many color-coded red bins vs. color-coded yellow bins there are across the region and then the color that is more prevalent can be chosen.
- While I understand the current proposal is only regarding color coding of multi-family receptacles, I also understand that the intent within the Regional Waste Plan is to eventually color code receptacles across all lines of business in the region. With that in mind, I would like to again strongly emphasize the need to consider color coding of lids only and not color coding of entire receptacles. Our company has always provided blue lids on recycling carts and have, in the last few years, begun providing yard debris carts with green lids. If we are mandated in the future to replace all these carts, it would involve purchasing, replacing, and disposing of approximately 70,000 carts.

Thank you,

Kristin Lechner  
President  
Pride Disposal & Recycling Company