



Public Comment Report

*Draft 2030 Regional Waste Plan:
Equity, health and the environment*

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INTRODUCTION

This document addresses issues and questions raised in the public comments submitted to Metro on the draft 2030 Regional Waste Plan. The plan is designed to provide direction for greater Portland for managing materials and products from production to disposal over the next twelve years. Implementation of the plan is a shared responsibility among Metro and city and county governments in the region. Over the 30-day comment period, which ended on December 21, 2018, more than 90 comments were provided by individuals and organizations on the plan, either online, by phone or in writing. In addition, Metro staff presented the draft plan to the Metro's Solid Waste Alternatives Advisory Committee on December 12, 2018 for review and comment.

REPORT ORGANIZATION

This report is organized into four sections. The first two sections present the comments received during the public comment period, organized by comments collected through the public comment process and those received at the Solid Waste Alternatives Advisory Committee meeting. In both sections, the comments and Metro responses are organized by the plan topic to which they are addressed followed by general comments that apply to the entire plan. Each comment in this report is followed by Metro's 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. The third section presents the revisions made to the plan as result of the input received. The last section outlines next steps for review of the final draft of the plan and the adoption process.

PUBLIC COMMENT AND RESPONSE

This section presents public comments received by web form, email, phone or mail. Specific recommendations from letters received as a part of the public comment period were extracted from the letters. The complete comments and submissions are provided in the appendices.

Introduction

- 1 Comment:** [Oregon Department of Environmental Quality staff] Page 6 (Introduction): the first paragraph on this page is elegantly written and demonstrates a firm understanding of - and commitment to - principles of sustainable materials management.

Response: Thank you for your input.

A new approach to managing waste

- 2 Comment:** [Oregon Department of Environmental Quality staff] Page 11 ("Addressing the full life cycle"): DEQ suggests that the first paragraph may more accurately reflect how the life cycle can be explained if written as follows: "Our regional waste system is one piece of an integrated whole that covers the entire life of the products we use, from design to production to use, until they go to a recycler, landfill or thrift store." Perhaps Metro could add the following to strengthen the linkage between different stages of the life cycle: "Decisions about how wastes are managed can impact design and production upstream of the consumer, and the region can further impact upstream decisions through material selection and waste prevention." Further, the remainder of the text on page 11 might be

strengthened by adding a sentence or two that justifies this broader/expanded approach. "By addressing impacts across the full life cycle of materials, the region can avoid unknowingly shifting environmental burdens (increasing impacts in one area even as we decrease the impacts of waste). And considering actions that can be taken across this full life cycle opens up additional opportunities to achieve our objectives."

Response: Thank you for your input.

- 3 **Comment:** [Oregon Department of Environmental Quality staff] Page 14 ("The life cycle of products and materials"): 2 references under "Product design and manufacturing" to "recyclable materials". DEQ's new research shows poor correlation between "recyclable" (packaging) and low impact, so the references to designing with more recyclable materials as a "way to reduce harmful impacts" should be deleted.

Response: Metro has amended the text to: "Design products to use fewer newly extracted natural resources and more recycled materials."

- 4 **Comment:** [Oregon Department of Environmental Quality staff] Page 14 ("The life cycle of products and materials"): Under "Product consumption and use" consider adding restricting the sale of (or access to) high impact products as another example of how to reduce harmful impacts. This change would be consistent with at least one action later in the plan.

Response: The following text was added to page 14, under "Product consumption and use," based on your suggestion: "Implement policies to restrict or limit the sale of, or access to, products with high impacts to human health and the environment."

Environmental impacts of products and materials

- 5 **Comment:** [Oregon Department of Environmental Quality staff] Pages 18 – 23 ("Environmental impacts of products and materials") Thank you for effectively using DEQ data (material recovery survey and the consumption based emission inventory) and for a clear and compelling exposition of environmental impacts. Overall, the framing in this section is very effective.

Response: Thank you for your input.

- 6 **Comment:** [Oregon Department of Environmental Quality staff] Page 20 ("Environmental impacts of products and materials"): Sub-caption of pie chart is not quite correct. DEQ asks that Metro change the sub-caption to the following: "In 2015, the Metro region generated 41 million metric tons of greenhouse gas emissions from the products and materials we ~~made~~, bought, used and threw away and the services we used."

Response: The text was revised to "... from the products and materials we bought, used and threw away..." based on your suggestion.

Values, Principles and Vision

- 7 **Comment:** [City of Portland staff] Values, principles and vision express shared intent. Your team adeptly identified a need to realign our focus areas on what matters most to people in our community. The Values succinctly describe the purpose of the Plan and clearly show Metro’s renewed commitment to the community. Your leadership in reimagining the role, opportunities and vision for a regional waste system will help guide our strategic thinking and ground new visions for the future. Given your collaboration with community stakeholders, we have confidence that this work represents the interests and shares an expression of intent of our community.

Response: Thank you for your input.

- 8 **Comment:** [Oregon Department of Environmental Quality staff] Page 47 (“Vision”): Under “Garbage and recycling operations” does Metro mean to say it is minimizing pollution of air, solids and water” or “air, soils and water”? The reference to “pollution of solids” is not clear.

Response: Thank you for your comment. This was a typo. The text was revised to “... minimizing pollution of air, soils and water” to match the Vision language endorsed by Metro Council in January 2018.

Goals and actions

Shared prosperity

- 9 **Comment:** [Wayne Brooks] Re; pay living wages. I think you should go a step farther. I suggest that the highest paid job must not exceed a certain multiple of the lowest job including benefits. See Ben and Jerry’s and Bob’s red mill as examples.

Response: Under goal 3, action 3.1 directs work to “Establish living wage and benefits standards for the lowest-paid positions in the solid waste industry and update the standard on a regular basis.” When working to implement this action, Metro, cities and counties will consider a variety of alternatives on how to best establish a living wage standard.

- 10 **Comment:** [Terrell Garrett] Goal 2.1 is admirable in its effort to cause portions of the solid waste spending to go local with emphasis on minority and women owned businesses. However, the goal stops well short. The goal should extend well past the amounts available through government contracting with goal of significant local participation through ownership in all facets of collection, processing and transfer stations.

Response: Under goal 2, action 2.2 aims to increase racial diversity in the ownership and management of collection service providers and action 2.3 provides direction to invest Metro grant resources to increase economic opportunities in all sectors of the garbage and recycling system for communities of color and other historically marginalized communities. However, Metro and local governments do not control who owns or invests in facilities.

- 11 Comment:** [City of Hillsboro staff] 2.1 Need to understand details of how this will work.
- Response:** Metro, cities and counties will develop the details during implementation of the plan.
- 12 Comment:** [City of Hillsboro staff] 2.2 Generally supportive, but need more detail and clear objectives.
- Response:** Cities and counties will develop the details during implementation of the plan.
- 13 Comment:** [City of Hillsboro staff] 2.3 Need an estimate of cost impact.
- Response:** Cost impacts will be determined at the time grant programs are developed. Metro's existing Investment and Innovation grant program is currently funded from Metro's solid waste reserve fund.
- 14 Comment:** [City of Hillsboro staff] 3.1 Need an estimate of cost impact.
- Response:** Metro, cities and counties will develop the cost estimate when identifying approaches for implementing this action.
- 15 Comment:** [City of Hillsboro staff] 3.3 This action seemingly should precede 3.2.
- Response:** The actions are not intended to be presented in chronological order. Your suggestion will be helpful when developing implementation work plans.

Product design and manufacturing

- 16 Comment:** [Wayne Brooks] Companies that sell excess packaging should have to take it back and have a plan for recycling it. If there is a product that can't be recycled such as product lids and caps, pizza boxes, and waxy cups and packaging then why is it being allowed to be sold in our state? Remember Reduce, Reuse and Recycle. Help develop a pizza box that customers can purchase and wash and then use it to pick up your next pizza purchase with a discount for saving the store. No caps or lids should be allowed to be sold that are not recyclable. If there are products that we buy that cannot be recycled you need to ask why and how can it be changed. No recyclable product should have any label or marking that stops it from being reused and/or recycled.
- Response:** Under goal 5, action 5.4 advocates for policy stewardship legislation for products and packaging. Extended producer responsibility is a type of product stewardship that includes, at a minimum, the requirement for the manufacture's responsibility for its product to extend to post-consumer management of that product and its packaging.

- 17 Comment:** [Thane Tienson on behalf of Asean Corporation] We recommend that the 2030 Regional Waste Plan include, as an action item, the adoption of statewide legislation establishing standards for compostability similar or identical to those adopted by the State of California and set forth in the California Public Resources Code §§ 42355-42357, which establish statewide standards in California for compostable plastics (ASTM D6400), non-floating biodegradable plastics in the marine environment (ASTM D7801) and biodegradable plastics used as coatings on paper and other compostable substrates (ASTM D6868). That legislation adopted in 2015 by the State of California has proved to quite effective in greatly limiting, if not eliminating, the advertising for sale of falsely labeled biodegradable and compostable plastics and increased the success of composting post-consumer food scraps to include certified compostable products. Similar standards have been adopted in Maryland and by the City of Seattle and are much needed of the large number of products on the market which are labeled as “compostable,” “biodegradable,” or “recyclable,” when, in fact, they are not so and do not comply with ASTM specifications. In that regard, California, for example, recently entered into a settlement with Amazon.com extracting over \$1.5 million in civil penalties to obtain consent order obligating Amazon to ensure that the plastic products advertised for sale through it and labeled as “biodegradable” or compostable” or some similar term did, in fact, meet the ASTM legal standards adopted by the state. These standards have not been adopted in Oregon, but they need to be, and we believe that doing so will help promote the above identified goals in the Regional Waste Plan.

Response: This recommendation is consistent with the intent of goal 5, action 5.6 to “Advocate for standards for high-impact products...” and may be considered in implementing that action over the life of the plan.

- 18 Comment:** [City of Hillsboro staff] 5.3 Need an estimate of cost impact.

Response: Metro and/or the State of Oregon partner agencies will develop cost estimates for the specific incentive program alternatives identified when implementing this action.

Product consumption and use

- 19 Comment:** [Heidi Barth] Food is currently purchased in disposable containers, most of which is plastic. Food needs to be sold in biodegradable or reusable materials, especially dairy products. Portland used to have a dairy with a drive through retail outlet, Senn's, where milk was sold in returnable glass containers. Additionally, coffee to go should not be sold in disposable containers. Imagine what this alone is doing to our planet!

Response: Under goal 7, action 7.2 focuses on reducing the use of single use products, including food packaging. This action will identify policies that Metro and local governments could adopt to reduce the use of these types of products.

- 20 Comment:** [Linda Martin] One of the most important things to me and so many of my neighbors that post on NextDoor, is the lack of recycling options for #1 plastics (clamshells, etc.)..... please, please, please help us find a way to recycle this kind of plastic! Many of us are saving it up hoping that we can find an option soon. This is the most prevalent plastic, and it's being dumped into our environment! It is pretty near impossible to avoid, no matter how hard we try! I really hope that Waste Management can find a solution to this problem.

Response: Metro and the region's city and county governments continually monitor the markets for recyclable materials. They add materials to curbside programs when markets are projected to be strong and stable. Under goal 15, actions 15.2 and 15.3 both direct work on regularly assessing curbside programs for additional materials and expanding local markets for priority materials. Action 10.8 calls for statewide legislation to require manufacturers and retailers to take back more types of packaging.

- 21 Comment:** [Robert Fortner] The "Recycling Receipt" provides recycling instructions for each packaging component of each product purchased. Intended to augment existing electronic receipts at grocery stores.

Response: Thank you for sharing your idea for how to increase awareness on the recyclability of different products.

- 22 Comment:** [City of Hillsboro staff] 6.6 Should strongly reconsider pinning efforts to one organization and especially website; these can change often in 10+ years.

Response: This action is specific to elevate the importance and commitment of the development of this web resource in which Metro and partners have invested a significant amount of resources. If the action becomes obsolete, then the plan could be amended to reflect the change.

- 23 Comment:** [City of Hillsboro staff] 7.1 Determination of 'low environmental and human health impacts' must be well informed by appropriate agencies/entities. Should list DEQ as lead here?

Response: Metro agrees that this work must be well-informed by other agencies and considers the Oregon Department of Environmental Quality (DEQ) a primary partner in identifying the relative impacts of products. This plan only has the authority to identify Metro, cities and counties as lead agencies, so cannot identify DEQ in that role.

Product end-of-life management

- 24 Comment:** [Norene Hough] I think there are many great ideas in this plan. It is not clear how the changes (or even the current initiatives) will be communicated to households. I live in an apartment and rarely get key information from Metro (how to reduce consumption, like what is recyclable, where can I take other items). Can this be given out with every new lease? How will information be given to residents?

Response: Currently, city and county governments are required to provide information on a regular basis to residents on waste reduction and recycling. That requirement will continue under this plan and Oregon statutory requirements. The actions under goal 6 give direction to provide education and tools focused on waste prevention and better purchasing choices. Under goal 9, there are several actions that direct increased efforts to develop education and information that are tailored to the needs of different communities including those that live in apartments.

- 25 Comment:** [Norene Hough] In my neighborhood, with many apartments we have so many different haulers that each only deal with specific contracts/ locations. This seems very wasteful. We have haulers 6 days a week all idling while they only pick up a small section of the neighborhood. This impacts air pollution, traffic, noise pollution etc. I understand that each building has selected a provider, but it would be better to have a providers bid for contracts for parts of the city and have the buildings pay Metro for a more streamlined process instead of the private haulers.

Response: With the exception of the City of Portland, collection service for apartment buildings in the region is franchised, with one hauler serving a specific geographic area. In Portland, service to apartments and buildings is not franchised, so there may be multiple haulers serving one geographic area. Under goal 14, action 14.5 calls for Metro, cities and counties to evaluate alternative models for garbage and recycling collection services to identify which would deliver the best environmental, financial, efficiency and equity outcomes.

- 26 Comment:** [Stephanie Millar] Return to weekly garbage pick up. Return to pre sorted recyclables. Pre sorting at home will help people keep track of what really is recyclable, and weekly pick up will reduce temptation to toss things in recycle just because your trash bin is full. Also, my teens and housekeeper seem unable to learn what is and isn't recyclable because they don't have experience with home sorting. In my office, I see people throw pens and binder clips into the paper bin and when I say not to they say-that's OK, they sort it all. Return to basics and personal responsibility.

Response: The City of Portland is the only jurisdiction in the region with less than weekly collection of garbage from “single-family” residential households, which it implemented to encourage waste reduction efforts and to enhance its recycling service options. Goal 14, action 14.5 calls for Metro, cities and counties to evaluate alternative models for collection services to identify which would deliver the best environmental, financial, efficiency and equity outcomes. Goal 15, action 15.1 is intended to address the impacts you associate with commingling recyclables and has been amended in response to your comment to read: “. . . efforts to improve material quality, including education, sorting instructions, collection equipment... “.

- 27 Comment:** [Chris Streight] I would hope that aside from items we can compost in our yards, we should be recycling nearly everything else. I am astounded by the number of items (mostly plastic) that I now throw away that I used to be able to recycle, both at the curb and taking it to Metro. Now it seems very little is recyclable. I would like to see a ban on the packaging that isn't recyclable either at the curb or by taking it somewhere local that has many locations. If we can't do this, then we need to stop making it. I am already trying to do my part by not buying lettuce and such in plastic containers. This needs to stop.

Response: Under goal 7, action 7.2 focuses on reducing the use of single use products that also includes packaging. This action will identify policies that Metro, city and county governments can adopt to reduce the use of these types of products. Goal 5, action 5.4 calls for Metro, cities and counties to advocate for product stewardship legislation, which

can facilitate the recycling of items not currently recycled. In addition, Metro and the region's city and county governments continually monitor the markets for recyclable materials and add materials to curbside programs when markets are strong and stable. Under goal 15, action 15.2 and 15.3 both direct work on regularly assessing curbside programs for additional materials and expanding local markets for priority materials.

- 28 Comment:** [Ralph Cohen] There is no mention of converting combustible but non recyclable waste currently disposed in landfills into electric energy by burning such as is done near Salem by Covanta (<https://www.covanta.com/Our-Facilities/Covanta-Marion>). While I agree totally that we want to minimize landfill waste and recycle/reuse more, as long as landfills are used, there is going to be waste that could be converted to electric power. This could displace coal or natural gas being used for the same purpose. The idea should at least be considered and evaluated. The other point that would be helpful to address is in "implementation" where funding is required to establish indicators - how much and by what means will funding be obtained? Otherwise, the study is thorough if a bit optimistic. Well done.

Response: Metro conducted a 5-year process to explore waste-to-energy options for a portion of the region's garbage. In July 2017, the Metro Council decided not to explore this option further due to the higher disposal costs and inconclusive health and environmental impacts associated with the waste-to-energy options available to the Metro region. Metro could reassess waste-to-energy in the future and amend the Plan accordingly.

- 29 Comment:** [Wayne Brooks] I think that having a Master Recycler program in local neighborhoods is a great idea.

Response: Under goal 9, action 9.3 directs work on community education including master recycler programs.

- 30 Comment:** [Wayne Brooks] All glass wine and spirits included should be included in the bottle bill. All bottles should be able to be cleaned and reused in addition to being reformed.

Response: The Oregon legislature has the authority over expanding the bottle bill. Under goal 15, action 15.9 supports action by Metro, cities and counties to advocate for expanding the bottle bill to include additional containers.

- 31 Comment:** [Wayne Brooks] Bus Stops should be required to have garbage collection that is kept clean and serviceable.

Response: The plan will be revised to include an action under goal 11 to, "Evaluate the need to expand and improve access to public collection containers to reduce litter and illegal dumping."

- 32 Comment:** [Wayne Brooks] I am not sure how to word this but Metro should lead in not just collecting but also take a lead in research and development of recycling systems as these ideas may be job producers in our state.

Response: Under goal 15, actions 15.3, 15.4, 15.6, 15.7 and 15.8 are intended to work toward developing strong and more local markets for recyclables.

- 33 Comment:** [Wayne Brooks] Be more aggressive in expanding the bottle bill it should make sense and not beer bottles and pop cans but not other glass and cans. We are after all talking about the future of our planet for our kids and grandkids.

Response: The Oregon legislature has the authority over expanding the bottle bill. Under goal 15, action 15.9 supports action by Metro, cities and counties to advocate for expanding the bottle bill to include additional containers.

- 34 Comment:** [Wayne Brooks] We should be mining old landfills to get recyclables back into the waste stream.

Response: Goal 15 contains a number of actions meant to strengthen markets for recyclables. Prioritization will be given to those materials already collected for recycling or that can be separated at the point of generation.

- 35 Comment:** [Wayne Brooks] Wastewater sewage and composted materials should be available to be purchased by farmers and the gardening public.

Response: Goal 10, action 10.1 directs cities and counties to continue to provide comprehensive collection services for recyclables, which includes compostable yard debris and food, and Goal 15, action 15.5 calls for governments in the region to facilitate the permitting of composting facilities. Both of these actions foster the production of compost. Compost facilities serving the region market their finished product to agricultural and consumer users. Federal and state regulations guide the uses of wastewater treatment and biosolids.

- 36 Comment:** [Wayne Brooks] Restaurants should have recycling areas and a place to empty beverage containers to ensure that ice and excess product gets returned to treatment plants and not just sealed up in a plastic bag and sent to a landfill.

Response: Metro, city and county governments will be working with restaurants to improve waste collection and disposal practices as part of this plan.

- 37 Comment:** [Susan Troup] I live in Project Based Section 8 housing in downtown Portland. We are not able to compost. We have no way to recycle electronics. Our recycle bins are so polluted with non-recyclables that I suspect most of it winds up in the landfill. There is no education program in the building to address this problem. A lot of the residents do not speak English.

Response: Problems in the quality and consistency of services to multifamily residents was strongly called out in the development of the plan. Actions listed under goal 10 are intended to address these deficiencies. In addition, the plan highlights the need to deliver both services and education in a manner that is tailored to the needs of all communities including developing culturally relevant materials in multiple languages.

- 38 Comment:** [Vance Lizza] There needs to be a method for serviced households to, in an environmentally safe way, dispose of small batteries and non-incandescent light bulbs. As things are now, too many cannot be troubled to search for such a thing; it is infinitely easier to simply throw such items in the regular trash.

Response: While there are existing services for these items and others categorized as household hazardous waste, Goal 10, action 10.4 acknowledges there are opportunities for improvement by identifying the need to “provide convenient, accessible and equitable collection” of these types of items.

- 39 Comment:** [Anonymous] I have a difficult time finding places to dispose of household batteries. It would be great if there was a place at your facilities to do so. Also, I strongly support continuation of the household hazardous waste drop-off days. They are great for getting rid of paint, cleaners and other things I can't put in my trash.

Response: Common household batteries may be taken to a hazardous waste facility. There are two permanent facilities that are open six days a week, 9 a.m. to 4 p.m., year-round. They may also be collected at collection events that are held throughout the region. Information on these options can be found at: oregonmetro.gov/tools-living/garbage-and-recycling.

- 40 Comment:** [Anonymous] Metro needs a partnership with ODOT that allows them to pick up dumped garbage on ODOT property. Referring reports of illegal dumping often does nothing—ODOT lets dumped garbage that's been reported sit for months sometimes. ODOT clearly doesn't care, but I get the impression that Metro does. The system isn't working.

Response: Metro works with other government and law enforcement agencies to clean up and investigate illegal dumps across the region. With ODOT, Metro is permitted to clean up dumped garbage on their property, but illegal camp site must be referred to ODOT. Goal 11, action 11.4 calls for Metro and city and county governments to continue to provide these services. As a part of this action, Metro will continue to work with ODOT to improve its coordination in responding to issues and efficacy of its resources.

- 41 Comment:** [Sage Cerulean] I would like to see composting services be available to residents in Oregon City. Also needle collection areas like in Portland are needed as people have shared on social media seeing needles on the ground in different parts of the city. I'm not sure what else at this time.

Response: Under goal 10, action 10.1 directs work to provide food scraps collection services to residents in the region. In addition, under goal 10, action 10.7 directs work to expand the collection of hypodermic needles in partnership with community organizations.

- 42 **Comment:** [Terrell Garrett] Goal 16.4 should add the word “current” between “Maintain” and “public.”

Response: This suggestion would change the meaning of the action.

- 43 **Comment:** [Terrell Garrett] Goal 16.5 should evaluate the feasibility of any facility in Washington County. While the verbiage does not preclude the private-owned facility to perform these functions, Metro staff is acting as if it does. Whenever a private entity can responsibly perform a public service it should be allowed to do so in preference to government provision of those services. This should be incorporated into 16.5.

Response: The plan’s goals and actions set policy direction across the next twelve years. Action 16.5 prioritizes the evaluation of a public facility in Washington County. This preference was identified by the Garbage and Recycling Operations technical work group as the best means to ensure a comprehensive range of services that are accessible to residents at affordable rates and operated in accordance with the goals of the plan. This action does not preclude private ownership and Metro, local and state governments would have the opportunity to consider the merits to the public of privately-owned facilities when considering land use, licensing, franchising and permitting applications.

- 44 **Comment:** [City of Portland staff] Goals and actions provide actionable pathway. Many of the goals and actions provide a clear framework for moving ahead. However, there are some actions that are less clear, could potentially be costly to implement and may bring unintentional consequences for residents and businesses (examples 10.1, 14.1, 14.3, 14.4, 14.7). If some actions are selected for further consideration, then conducting research into underlying assumptions on the solutions would be needed. We (City of Portland) believe that, together, we can meet the intent of the actions.

Response: Following plan adoption, Metro and local governments will develop three-year work plans that prioritize actions for implementation. These plans will include estimates of the financial and staff resources needed to complete the work. The implementation of each action will include preliminary steps to scope the work needed that will include consideration of the consequences of each action.

- 45 **Comment:** [Jannike Allen] It is heartening to see Metro take steps to improve the waste system. While visiting a waste sorting plant in Oslo, Norway, I was repeatedly told how important it is to view waste as a resource. In Oslo, it truly is a resource (food waste gets turned into biogas to power city busses and biofertilizer for use on nearby farms, plastic is collected separately to send by train to recycling facilities, and remaining waste is incinerated to create power for heating buildings). A caution that can be taken from the system in Oslo is that much effort needs to be focused on training people to sort, which

requires fostering a culture of viewing waste as a resource. Their system involves distributing green and blue bags that people can pick up at grocery stores so that at home they can put food waste in the green bags and plastic in the blue bags. This is so that the blue and green bags can be collected with the regular trash, as sorted by machines that recognize color to divert them to different pathways. We can't afford to forever throw away the nutrients in food waste and other organic matter. As a society we need to combat our addiction to plastic, and recycle the plastic that is already here- which requires clearer messaging to consumers so that they know how to avoid contaminating loads of recyclables. Metro should look into the options around incineration, since it provides an opportunity to reduce space required in landfills (certain ash even being able to be dispersed instead of contained if it is not toxic), and retrieving value from waste that would otherwise be useless (creating energy). It is great that Metro is working on bringing together stakeholders to figure out what works in our region, and I think a lot of ideas can be gained from models elsewhere.

Response: Metro conducted a 5-year process to explore waste-to-energy options for a portion of the region's garbage. In July 2017, the Metro Council decided not to further explore this option due to the higher disposal costs and inconclusive health and environmental impacts associated with the waste-to-energy options available to the Metro region. Metro agrees with the benefit of looking to models elsewhere, reduce contamination in recyclables, recover food scraps and address plastics, and those needs are represented in other actions in the plan.

- 46 Comment:** [Washington County Haulers Association] As the Plan process continues, please note that member haulers also support most of the concerns and comments local government representatives have already provided such as local government authority to set collection rates and determine appropriate service levels for their community. Some regional consistency may be appropriate, but not for all areas, as smaller communities don't have the resources and increasing some requirements for them could actually create barriers. As a result, it is important to consider economic impacts and related cost benefit analysis for the action items.

Response: Throughout the process of developing the plan, Metro heard from residents that consistency of service across jurisdictional boundaries is important to them, because people move from community to community and work in places different than where they live. These anecdotal observations are backed up by data that show a high percentage of the region's population moves within the region each year. The region's system of local government rate-setting, cooperative work on educational programming among jurisdictions within Washington and Clackamas counties, respectively, and funding from Metro to local jurisdictions, positions the region well to address the needs of smaller and larger communities.

- 47 Comment:** [City of Hillsboro staff] The plan must ensure transparency in rate setting at all facilities that receive waste generated within the region.

Response: Under goal 14, action 14.2 directs action to implement transparent and consistent rates for all facilities.

- 48 Comment:** [City of Hillsboro staff] The plan must prioritize the completion of the solid waste system infrastructure and services to ensure equitable access to facilities and services.

Response: This is addressed in multiple actions under both goal 10 pertaining to services and goal 16 that addresses the infrastructure of the system.

- 49 Comment:** [City of Hillsboro staff] 10.1 Should only mandate when the regional infrastructure is complete and equitable. Until such time should not list action as directive.

Response: Action 10.1 addresses a number of services, some of which have been required by Metro for almost a decade or by the state for a much longer period, and some that are newer, such as the separation requirement for business-generated food scraps. While the food scraps infrastructure is currently adequate to serve many generators, as demonstrated by the successful voluntary programs in Hillsboro and other jurisdictions, Metro will continue to work on developing the transfer and processing system to make it more robust. The separation requirement will help ensure adequate and reliable supply to do so, and Metro intends to subsidize transportation costs for those haulers that have to travel farther than an average distance while the additional infrastructure is developed.

- 50 Comment:** [City of Hillsboro staff] 10.3 Must understand the cost impact. Will likely be major impact.

Response: Costs will be assessed as part of Metro, cities and counties developing the action's implementation plan. While there is a strong and overdue need for consistency in cart colors and signage, Metro does not anticipate that this action would be implemented in every jurisdiction at one time, but instead could be implemented over a reasonable amount of years. Cart costs are generally depreciated over years and reflected in annual collection rates.

- 51 Comment:** [City of Hillsboro staff] 10.4 First ensure that infrastructure supports the objective. Why is this one not directive?

Response: There are multiple options for carrying out this action, some of which require permanent infrastructure and some which do not. Directive actions in the plan are those that are defined as binding on local governments. This is intended as an action to be primarily carried out by Metro, rather than cities and counties.

- 52 Comment:** [City of Hillsboro staff] 10.5, 11.6, 12.3. Need an estimate of cost impact.

Response: Metro, cities and counties will develop the cost estimate when identifying approaches for implementing this action. Metro anticipates that there are multiple implementation paths for each of these actions.

- 53** **Comment:** [City of Hillsboro staff] 10.6 This must be done locally, not regionally. Please ensure clarity that specific standards will be set by cities and counties, not Metro.
- Response:** Standards for on-site solid waste collection areas at multifamily properties are typically implemented through city and county development and/or building codes. Metro's interest (which is shared by multifamily residents, cities and counties) is ensuring that these standards result in residents having adequate access to collection containers, and that there are not significant inconsistencies in access across jurisdictions.
- 54** **Comment:** [City of Hillsboro staff] 14.1 We feel strongly that the explicit assumption is that 'consistent' processes do not necessarily mean the 'same'. There are too many variables and local requirements/authority to expect sameness.
- Response:** The word choice is intentional, with "consistent" not meaning "same." The outcome, however, should be the same: ratepayers understand how their rates are determined. The inclusion of this action is not intended to imply that this consistency and understanding are not present now.
- 55** **Comment:** [City of Hillsboro staff] 14.3 This should be up to the local government; do not require, but guidance and best practice is welcome. As with 14.1, please be explicit that 'consistent' is the goal, rather than 'same'.
- Response:** The intention of this action is to ensure that, for example, rates in Hillsboro for weekly 35-gallon cart service are not significantly different than rates for that same service in Gresham. The word choice is intentional, with "consistent" not meaning "same."
- 56** **Comment:** [City of Hillsboro staff] 14.4 Need an estimate of cost impact. Local governments retain authority to determine whether and to what extent to implement program.
- Response:** Metro, cities and counties will develop the cost estimate when identifying approaches for implementing this action. There are likely multiple options for rate assistance programs.
- 57** **Comment:** [City of Hillsboro staff] 14.6 Unnecessary for collection, this is already done locally.
- Response:** This action is specific to facilities.
- 58** **Comment:** [City of Hillsboro staff] 15.4 Generally support objective; need an estimate of cost impact.
- Response:** Metro, cities and counties will develop the cost estimate when identifying approaches for implementing this action.

59 Comment: [City of Hillsboro staff] 15.10 Generally do not support higher tip fees; already among the highest in the U.S.

Response: Thank you for your input.

60 Comment: [City of Hillsboro staff] 16.5 Support.

Response: Thank you for your input.

61 Comment: [Amanda Scheetz] One of the things that I wrote just very briefly is that I'd like to see more trash cans in the city. One of the things that I've noticed that the actual function of them makes them not user friendly. While it's a good idea that it's a trash compactor, you almost feel like you're going to get a disease. From touching it! Um pulling down the handle... it goes so far down and then trying to get the garbage in. It's very dirty. As well as... I'd like to see the option to have a recycling you know, so if it's a garbage can, also with a recycling area with it.

Response: The plan will be revised to provide direction to evaluate public collection containers to address litter and dumping under action 11.7.

62 Comment: [Amanda Scheetz] I had another idea or another thought. I'm not EXACTLY sure what it all entails 'cus I'm kind of new. But one of the things that I've come across is having uh a better understanding of what is actually recyclable. At home as well as uh . . . the ease of it. Does that make sense? I know they've got like pictures but actually like knowing "oh your pizza box that you're putting in doesn't actually go into the recycling like you're thinking.

Response: Under goal 9, there are multiple actions that direct work to increase knowledge among community members about garbage, recycling and reuse services. This includes education on what is recyclable. The actions will be informed by research that Metro conducted in 2018 that identifies the challenges that residents have with current instructions and educational material, and best practices for these materials that should make them better and more useful to users.

63 Comment: [Amanda Scheetz] This might just be a little too far out there but... at home recycling... receptacles for like the in home. You know, not just the big bulky ones that people keep in the garage, but even something. Do you guys have anything like that?

Response: Governments and haulers typically haven't provided those inside receptacles because of variability in what individuals want and would use. There have been some exceptions to this, such as a city providing bags to multifamily residents for use in their households. This could be looked at again through Goal 10, action 10.1.

64 Comment: [Bella Gurvich] I want to say. We not enough talking about compost. Because I just realized... not for a long time ago... carton from pizza I can't put all this carton to recycle. This part not clean part. I thought I know everything but it's always we can to do better. And more. And this part of carton... this is uh grease I can't put to recycle. And I can

put this to compost. I hear this by TV. Local news. It was very good they doing this. People can understand better because they explain and show everything. And we must to think about compost more. What we can put some carton maybe because people don't know. Maybe don't think about this.

Response: Metro and local governments recognize that what to do about pizza boxes is confusing to residents. This will be clarified as part of the current examination of what should be included in residential recycling and composting programs.

- 65 **Comment:** [Diane Williams] They were saying you know that the plastic issue, you know. And, uh I was seeing in Tigard they are taking plastics and recycling them and stuff. I was wondering if there was any way that Metro could reach out and have like certain places in town where they could be picked up you know the plastics that we're all having fits about, you know? And she was saying "B-Line" comes and picks it up. But, um, and they take it out to Tigard and they recycle it and why can't that be part of our solution with plastics?

Response: Metro, cities and counties share the interest in developing better markets and supporting collection systems for Styrofoam, the material accepted by the Tigard facility. We have talked to that facility about the options and hope that some will be able to be implemented in the near future. Goal 15, action 15.3 best addresses this need.

- 66 **Comment:** [Diane Williams] A lot of this stuff... if we had a shredder or something just to make it smaller. People are making shirts, clothes, everything out of this stuff now. I couldn't even believe some of the coats and stuff they're making out of this stuff. So, um, maybe we'll be able to make building materials since the housing... and explore the housing industry, you know. If they can't make it out of clothes, maybe they can put it into some of their products that they're building (buildings and stuff) with. Especially since this earthquake it's going to give a little boom...

Response: Goal 15, action 15.3 best addresses this need.

- 67 **Comment:** [Elaine Soljaga] We must provide systems to support a comprehensive plan, to include: All commercial properties (including apartments) should be required to provide recycling. All food service businesses should be required to divert organic material.

Response: Agreed. Goal 10, action 10.2 directs cities and counties to provide minimum service levels for apartments to ensure individuals have adequate access to recycling. Metro also recently adopted a food scraps requirement that requires certain businesses such as grocery stores, restaurants and schools to separate their food scraps from garbage.

Measuring progress

- 68 **Comment:** [City of Hillsboro staff] Strongly suggest that indicators be deliberately put forward as 'initial' and provide for flexibility and adaptation through the early stages of

implementation. Quality and availability of data will change, and the Plan should be flexible to include the best indicators to gauge progress.

Response: Metro agrees with the advantages of flexibility and adaptation, while noting that evaluation of the plan will be best served by having indicators put in place so that data can be gathered over multiple years. As noted in the comment, the early stages of implementation will allow for consideration of options based on relative quality and availability of data.

- 69 Comment:** [Oregon Department of Environmental Quality staff] Page 103 (“Measuring progress”): The list of key indicators is diverse and broad-reaching. DEQ supports the indicators identified. DEQ notes that the recovery rate is not listed.

Response: The recovery rate was not included as a key indicator to prioritize other indicators that reflect the plan’s broader focus on sustainable materials management, such as the first and second key indicators. Note, however, that the indicator for goal 10 does relate to the recovery rate: The environmental impacts associated with the recovery rate for the Metro wasteshed.

- 70 Comment:** [Oregon Department of Environmental Quality staff] Under Goal 5, the second recommended indicator needs clarification. The goal (#5) is titled “Product design and manufacturing”. The indicator is “Share of priority products covered in Oregon by a product stewardship framework”. Given that most product stewardship legislation focuses primarily on EPR at end-of-life, this may be an incomplete measure of reducing the environmental and human health impacts of products and packaging made, sold, used or disposed of in Oregon as most of the impacts are not subject to reduction via EPR.

Response: Metro acknowledges DEQ’s point and will look at revising or replacing this indicator when it begins work on developing the goal level indicators, and would welcome the chance to collaborate with DEQ on it.

- 71 Comment:** [Oregon Department of Environmental Quality staff] Goal 7: Why limit the indicator to only purchasing by government? Action 7.4 relates to the environmental impacts of the built environment, which are huge and also somewhat under the direct control, or at least subject to the strong influence of, Metro and local governments. DEQ recommend including an indicator about the life-cycle impacts of the built environment.

Response: The plan includes this indicator as a tool for incentivizing Metro, cities and counties to serve as leaders in sustainable purchasing. Metro will consider the additional recommended indicator when developing the goal level indicators.

Implementation, compliance and amendments

- 72 Comment:** [Oregon Department of Environmental Quality staff] Page 111 (“Roles and responsibilities”): The discussion of “private sector” is limited to waste businesses as well as reuse and repair. DEQ recommends noting that businesses that make and sell the

products that become waste contribute to environmental impacts and have roles in the actions.

Response: The beginning of the paragraph has been amended to: “Businesses make and sell products and are identified in this plan as having responsibilities related to reducing the environmental and human health impacts of their products and in managing these items at the end of their use. In addition, for-profit businesses...”.

- 73 Comment:** [Oregon Department of Environmental Quality staff] Page 119 (“Plan oversight”): DEQ requests being included in the Regional Waste Plan Implementation Committee.

Response: The membership of the committee will be determined by the Metro Council following adoption of the plan.

Acknowledgements

- 74 Comment:** [Oregon Department of Environmental Quality staff] Under Technical Work Group members/Healthy Products, Ali Briggs-Ungerer’s affiliation is missing and has been replaced with Minal Mistry’s name and affiliation, which should be on a separate line.

Response: The errors have been corrected.

Appendices

- 75 Comment:** [Oregon Department of Environmental Quality staff] Appendix 2, Pages 124-136, DEQ has reviewed and finds Metro’s Waste Reduction Program and Plan to be approvable. As discussed, once adopted, DEQ intends to draft an approval letter and will issue a public notice of DEQ’s intent to approve Metro’s Waste Reduction Plan as required under ORS 459.055.

Response: Thank you for this information. Metro is pleased to continue to work with DEQ on effective implementation of statutory requirements.

- 76 Comment:** [Oregon Department of Environmental Quality staff] Pages 142 – 148 (“Glossary”): Some definitions conclude with what appears to be a source, while others do not. Consider being consistent and putting the source name in parentheses.

Response: Sources for definitions were included for definitions that were drawn from other published documents.

General comments

- 77 Comment:** [Wayne Brooks] We should have stronger plans to disconnect rainwater runoff from the sewer system. Streets and parking lots should be permeable. Housing should have rainwater and grey water collection systems as part of our building codes.

Response: The scope of this plan is limited to solid waste management that includes waste reduction, collection, transfer and disposal of waste and managing the impact of products from production to disposal.

- 78 Comment:** [Mike Mercer] Overall, the plan looks good and I particularly like the systems approach used in its development. All items seem important, and I hope there is a way to prioritize goals to ensure we address and effectively spend \$ on those goals that have the largest overall impact. I didn't see anything on trash generated by the homeless population. I understand there is work being done with our homeless community members to reduce the amount of trash generated and made visible through lack of disposal options. I may have missed it in my scan, but is there something Metro and other regional municipalities could do to create thriving, local markets for our recyclables?

Response: Goal 11, action 11.5 and 11.6 direct work to address solid waste generated by people experiencing homelessness. Many of the actions under goal 15 are intended to address the development of markets for recyclables, including local ones.

- 79 Comment:** [Kevan Anderson] Excellent work! Thank you for sharing the draft. You have identified a dizzying number of goals and action items with so many "investment needed." It is a steep hill to climb but with good leadership and the commitment of the public, I hope to see the region making great progress. Courage!!

Response: Thank you for your input.

- 80 Comment:** [Arlen Sheldrake] Really, you expect me to read a 152- page document and then comment on it? I consider your request to be a sham.... If you were serious, you would give me a summary and then ask me to respond to some questions or statements.

Response: The web site provides a narrative table of contents that summarizes each component of the plan.

- 81 Comment:** [Rob Nathan] I am very pleased with how thoughtful Metro has been during the development of this plan. I particularly like its commitment to racial equity and leading with race. I look forward to seeing the outcomes of this plan take shape.

Response: Thank you for your input.

82 Comment: [Semion Gurvich] Я участвую в этом по работе уже длительное время. Да, и я считаю, что я ознакомился с документами. Да, и что это хороший план, если он будет реализован полностью, как намечено. И радует профессиональная работа всех групп Metro. И отношение к представителям разных общин. Translated: I'm participating here for a long time. I read through the whole document. And I believe it will be a very good plan if it will be applied in the whole piece. All the details will be included. And it's very heartwarming the professional work of the whole group. And also warm attitude toward all the diversity cultures.

Response: Спасибо за ваши предложения. Thank you for your input.

83 Comment: [Emma Brennan] I am thrilled this document. I loved seeing the inclusion of equity as a major component of this plan. This is what good governance looks like!

Response: Thank you for your input.

84 Comment: [City of Portland staff] Plan and planning process are commendable. Rarely have we seen this type of intense effort to engage a diverse set of stakeholders on a wide reaching array of actions. Your work within the community, particularly in low-income and communities of color, has created a strong foundation for future collaboration. Portland City Council adopted a Waste Equity Plan in October 2018 and we believe that working together we can make important progress in this area.

Response: Thank you for your input.

85 Comment: [Washington County Haulers Association] Member haulers appreciate all of the work representatives of Metro, community members, and industry stakeholders have contributed to create the 2030 Regional Waste Plan. In reviewing the Plan members hold similar values and more specifically, the haulers support concepts

- promoting safe, reliable, responsive, and affordable services accessible to all persons
- expanding diversity, equity, inclusion within the industry
- reducing adverse environmental impacts and
- reducing waste.

Response: Metro appreciates these comments and the important role of the Washington County haulers in the regional solid waste system.

86 Comment: [City of Hillsboro staff] The timeline for this comment period (three weeks total to provide input at SWAAC, and one month total for the review period) is insufficient to realistically schedule briefings with City leadership to garner their input. We ask that Metro extend the deadline a minimum of one month so that we have time to get input from leadership.

Response: The process for developing the plan began in spring 2017. Metro designed and implemented the process so that there were sequential opportunities for local

governments and others to review and comment on the component parts of the plan. These opportunities included engagements with the Metro Policy Advisory Committee (MPAC), the Solid Waste Alternatives Advisory Committee and public meetings with the Metro Council. The goals, which were the final substantive part of the plan to be developed, were released in essentially their final draft form in September, three months prior to the public comment deadline. Metro staff would be happy to accept additional comments by local governments up to and including the January 23, 2019 MPAC meeting. The plan adoption timeline was not changed based on this comment.

- 87 Comment:** [City of Hillsboro staff] The plan must estimate cost impacts of actions over the duration of Plan. Not specifically, but at least order of magnitude. This comment has been voiced before, and there appears to be no new effort to estimate cost impacts of the Plan.

Response: The breadth of work reflected in the plan make overarching cost estimates of little utility to understanding the plan's new elements. The bulk of the costs for implementing the plan will be associated with existing services, such as garbage and recycling collection programs. A few other actions in the plan, like those related to very large capital expenditures for a Washington County transfer station and improvements to the Metro South transfer station, would similarly skew total costs. Finally, as noted previously, costs for many of the actions will be developed once the actual implementation approaches are identified.

- 88 Comment:** [Oregon Department of Environmental Quality staff] DEQ appreciates and applauds the process that Metro has used to develop the plan. Metro staff and management have made a very sincere and concerted effort to develop this plan to reflect the needs of the broader public, to make meaningful efforts to address historic and current inequities (specific to race), and to broaden the region's focus from "waste" to sustainable materials management. There are several references to the DEQ 2050 Vision and an expressed desire to align with it. The document is also very nicely organized and presented and easy to read. The Draft 2030 Regional Waste Plan points Metro in a good direction and deserves our support. DEQ appreciates the openness that Metro has demonstrated in meeting with DEQ and being receptive to DEQ's suggestions throughout the Metro process of developing the plan.

Response: Metro has appreciated the opportunities to work with DEQ on the development of this plan and the DEQ 2050 Vision.

- 89 Comment:** [Oregon Department of Environmental Quality staff] Page 51 ("Navigating the action tables"): Does Metro want to include State agencies in the description of Partnership agreements?

Response: The description of "Partnership agreements" on page 51 has been revised to: "Agreements to implement partnerships by Metro, city, county and/or state agencies, and agreements between Metro or local governments with non-profit and community-based organizations."

90 **Comment:** [Oregon Department of Environmental Quality staff] Page 51 (“Navigating the action tables”): Perhaps Metro may want to clarify that “existing programs” reflect that Metro has existing tools that could be used to carry out new actions. For example, Action 6.5 “Assist households and businesses in the adoption of practices that prevent the wasting of food and other high-impact materials” lists the implementation approach as “Existing programs” but what if Metro were to enter into new “Partnership agreements” which are used in existing programs but might be new ways to use existing tools to accomplish this new action? Similarly Action 7.4 states that implementation will be through “Existing programs” but there is huge potential for Metro to use many tools here such as Partnership agreements, Code changes, Legislative agendas, etc. For the many actions identified as “Existing programs”, the casual reader might assume that Metro intends no new work or programs, which may not be Metro’s intent. DEQ suggests additional clarification so that if Metro decides to grow an action out of an existing program into something like a “Legislative agenda” the plan is not restricting this by how the implementation action is interpreted or worded. This section “Navigating the action tables” would benefit from a note stating that the listed approaches are for illustration purposes and are not restrictive.

Response: The plan was revised to include additional language that the approaches are not restrictive. The following text was added on page 50, to the “Implementation approach” section: “The approaches identified for each action in the action tables are preliminary ones. Additional approaches may be used based on development of the action and the lack of inclusion of a particular approach in no way implies that it may not be considered or used in the future.”

91 **Comment:** [Oregon Department of Environmental Quality staff] Page 81 (“Keeping it Separated”): The graph is very confusing. It suggests that 21 percent of garbage is non-recyclables from multi-family and an additional 9 percent is from single-family, for a total of 30 percent. DEQ recommends that these two sectors not be stacked on top of each other in this way.

Response: Metro staff became aware of this error after publication of the draft plan. The graph on page 81 has been revised to accurately present the results from Metro’s single family and multifamily recycling contamination studies.

SOLID WASTE ALTERNATIVES ADVISORY COMMITTEE COMMENT AND RESPONSE

This section presents comments received at the December 12, 2018 Solid Waste Alternatives Advisory Committee meeting. Specific recommendations and input on the plan were drawn from the meeting minutes. The full meeting minutes are provided in the appendices.

Goals and actions

Shared prosperity

- 1** **Comment:** Goal 3, action 3.4: Businesses often have fluctuations in workload that require the use of temporary and contract workers. Overall, this goal area has worthy objectives.

Response: Thank you for your input.

Product consumption and use

- 2** **Comment:** Actions 6.3 and 6.5: “Residences,” “households” and “businesses” are frequently mentioned; should the plan also reference “schools,” or should these be included with “institutions?” This could recognize some of the technical assistance and infrastructure work going on at schools (e.g. Eco-Schools Network).

Response: The plan was revised to include a definition of “businesses” in the glossary that indicates the term is inclusive of institutions, generally, and schools, specifically.

- 3** **Comment:** Action 6.3: Should this be broader? The language could be changed to “reduce the use of products” rather than “single-use products.” The term “single-use” could lead to confusion, as something like a toothbrush might be considered single-use.

Response: Single-use products were prioritized as a material by the technical work groups. Other actions contain a focus on products with high environmental and/or human health impacts. The plan does not focus on general reduction in use of products because of concerns regarding the equitability of such actions.

- 4** **Comment:** Action 6.5 might be the right place to include recognition programs for work to reduce food waste or other waste at businesses.

Response: Metro has added an action that states “Implement recognition programs for business efforts to prevent waste and minimize the environmental impacts of the products they purchase.” Cities and counties are identified as the lead agency for this work.

- 5 **Comment:** Action 6.6 seems very specific and feels like a task rather than an action.

Response: This action was intended to be specific and elevate the importance and commitment of the development of this web resource in which Metro and partners have invested a significant amount of time and money.

- 6 **Comment:** Goal 7: There is no specific reference of Extended Producer Responsibility (EPR) or recycled content legislation.

Response: EPR shows up in Goal 5, action 5.4 as an implied approach of product stewardship to emphasize and prioritize the upstream elements. Recycled content legislation is addressed through Goal 15, action 15.8.

Product end-of-life management

- 7 **Comment:** Goal 10, action 10.6: Guidance from Metro on how cities create ordinances will be very helpful.

Response: The work under action 10.6 will likely include the development of model ordinances and/or identification of best practices. This level of detail will be developed as part of the implementation plan.

- 8 **Comment:** Action 10.1: this action requires a complete system infrastructure that is not yet in place. The action should be explicit in stating that it will require a complete system infrastructure.

Response: Action 10.1 addresses a number of services, some of which have been required by Metro for almost a decade or by the state for a much longer period, and some that are newer, such as the separation requirement for business-generated food scraps. While the food scraps infrastructure is currently adequate to serve many generators, as demonstrated by the successful voluntary programs in Hillsboro and other jurisdictions, Metro will continue to work on developing the transfer and processing system to make it more robust. The separation requirement will help ensure adequate and reliable supply to do so, and Metro intends to subsidize transportation costs for those haulers that have to travel farther than an average distance while the additional infrastructure is developed.

- 9 **Comment:** Action 10.6: This might be an action that could be expanded to businesses and institutions, not just multifamily housing.

Response: Multifamily was prioritized as an area of improvement based on the most recent study conducted by Metro that identified inadequately designed collection areas as a major and common barrier to recycling. However, the action may be expanded to include businesses and institutions.

- 10** **Comment:** Action 15.2: Should we change the phrase “curbside recyclables” to “curbside materials” because some items that end up in the garbage may have high environmental impacts?

Response: The action was revised to: “Regularly assess the list of recyclable materials collected in residential and business programs in the region...”

- 11** **Comment:** 16.5: Washington County is happy to be partners with Metro in the prospect of a Washington County public transfer station.

Response: Metro looks forward to working with the County on this action.

- 12** **Comment:** Goal 14: Transparency is important, but the goal should also be about adopting consistent services, rather than consistent rates. We have consistent services, but we have inconsistent rates throughout the region. Many people who move across jurisdictions in the region report changes in rates and services.

Response: Metro agrees. Goal 10 and its actions speak to consistency of services and Goal 14 and its actions to rate-making and rates themselves.

- 13** **Comment:** Action 14.4 should be up to local governments to decide to implement rate assistance. Suggest the action use the term “explore” or “provide a framework.”

Response: There was a strong sentiment from the Equity Work Group and the community at large that Metro, cities and counties give strong consideration to what other utilities do with respect to rate assistance. Cities and counties are identified as the leads on action 14.4. Since it is a non-directive action, if no progress is made, then Metro may convene stakeholders to consider next steps.

- 14** **Comment:** Actions 14.1 and 14.7. The City of Portland shares rate information every year with customers; how much more information should they share. It does not seem valuable to provide line item components of customers’ bills.

Response: The actions reflect work that is already underway and don’t pre-suppose that it is inadequate. Through many engagements, Metro heard from community that they want to ensure there is transparency and consistency, since ratepayers often move from jurisdiction to jurisdiction. The actions do not state which information is to be provided to fulfill the intent. That will be determined during implementation work.

- 15** **Comment:** Regarding the information on collection rates on page 88, some aspects of rates are controlled by franchise agreements with local haulers. Rate transparency will take a lot of work.

Response: The example list of what is included in rates (page 88) is simply intended as an example and is not meant to be prescriptive.

- 16 Comment:** Suggest an appendix be added to identify the goals that relate to similar subjects. For example, the issue of plastics recycling could include Goals 5, 10 and 15.

Response: Thank you for your input.

General comments

- 17 Comment:** The ambitions and objectives are almost all good, but it is just too much in that impacts to the ratepayer have not been assessed.

Response: The plan will be implemented through three-year work plans that will identify actions for implementation. Costs will be developed during early stage work on each action.

- 18 Comment:** The comment period is not enough time to review the plan and be fully informed.

Response: The process for developing the plan began in spring 2017. Metro designed and implemented the process so that there were sequential opportunities for local governments and others to review and comment on the component parts of the plan. These opportunities included engagements with the Metro Policy Advisory Committee (MPAC), the Solid Waste Alternatives Advisory Committee and public meetings with the Metro Council. The goals, which were the final substantive part of the plan to be developed, were released in essentially their final draft form in September, three months prior to the public comment deadline. Metro staff would be happy to accept additional comments by local governments up to and including the January 23, 2019 MPAC meeting.

- 19 Comment:** The plan's emphasis on equity is very important. As part of implementation, Metro needs take specific actions in its own contracting with respect to equity. Metro has enormous contracts – are there ways to do Metro's contracting to bring in more a diverse and equitable reflection of the region's workforce?

Response: Under goals 2 and 3, there are multiple actions that direct work for Metro in advancing progress toward equity objectives through its own contracting practices.

- 20 Comment:** The plan sets a positive, comprehensive, and challenging work plan. Local governments and Metro will be able to work on it and be successful.

Response: Thank you for your comment.

21 **Comment:** “Requirements for local governments” section does not seem comprehensive.

Response: This section on page 113 of the draft plan is a summary of all the directive actions in the plan. This section responds to requests for the directive actions to be made very clear in the plan.

22 **Comment:** The plan is a very comprehensive and aspirational plan and that we need to have aspirational goals to stretch and reach.

Response: Thank you for your comment.

SUMMARY OF PLAN REVISIONS

Based on the comments received during the public comment period, the following changes were made to the plan:

Suggested Change	Revised Plan Text
Page 14 (“The life cycle of products and materials”): 2 references under “Product design and manufacturing” to “recyclable materials”. DEQ’s new research shows poor correlation between “recyclable” (packaging) and low impact, so the references to designing with more recyclable materials as a “way to reduce harmful impacts” should be deleted.	Metro has amended the following text to: “Design products to use fewer newly extracted natural resources and more recycled materials.”
Page 14 (“The life cycle of products and materials”): Under “Product consumption and use” add restricting the sale of (or access to) high impact products as another example of how to reduce harmful impacts.	The following text was added, under “Product consumption and use”: “Implement policies to restrict or limit the sale of, or access to, products with high impacts to human health and the environment.”
Page 20 (“Environmental impacts of products and materials”): Change the sub-caption to the following: “In 2015, the Metro region generated 41 million metric tons of greenhouse gas emissions from the products and materials we bought, used and threw away and the services we used.”	The text, under “Greenhouse gas emissions from products, materials and services,” was revised to: “... from the products and materials we bought, used and threw away...”
Page 47 (“Vision”): Under “Garbage and recycling operations,” change “solids” to “soils”.	The text was revised to “... minimizing pollution of air, soils and water” to match the Vision language endorsed by Metro Council in January 2018.
Page 51 (“Navigating the action tables”): For the many actions identified as “Existing programs”, the casual reader might assume that Metro intends no new work or programs, which may not be Metro’s intent. DEQ suggests additional clarification so that if Metro decides to grow an action out of an existing program into something like a “Legislative agenda” the plan is not restricting this by how the implementation action is interpreted or worded. This section “Navigating the action tables” would benefit from a note stating that the listed approaches are for illustration purposes and are not restrictive.	The following text was added on page 50, to the “Implementation approach” section: “The approaches identified for each action in the action tables are preliminary ones. Additional approaches may be used based on development of the action and the lack of inclusion of a particular approach in no way implies that it may not be considered or used in the future.”

Suggested Change	Revised Plan Text
Page 51 (“Navigating the action tables”): Does Metro want to include State agencies in the description of Partnership agreements?	The description of “Partnership agreements” on page 51 has been revised to: “Agreements to implement partnerships by Metro, city, county and/or state agencies, and agreements between Metro or local governments with non-profit and community-based organizations.
Actions 6.3 and 6.5: “Residences,” “households” and “businesses” are frequently mentioned; should the plan also reference “schools,” or should these be included with “institutions?” This could recognize some of the technical assistance and infrastructure work going on at schools (e.g. Eco-Schools Network).	The plan was revised to include a definition of “businesses” in the glossary that indicates the term is inclusive of institutions, generally, and schools, specifically.
Include an action that addresses expanding public collection containers at bus stops and other areas.	A new action was added under goal 11, “Evaluate the need to expand and improve access to public collection containers to reduce litter and illegal dumping.”
Revise action 15.1 to include “sorting instructions.”	The action was revised to, “Implement regionally consistent contamination reduction efforts to improve material quality, including education, sorting instructions, collection equipment changes, and customer feedback methods.”
Revise Action 15.2: to “curbside materials” instead of “curbside recyclables”	The action was revised to, “Regularly assess the list of recyclable materials collected in the residential and business programs in the region relative to end-markets, life cycle environmental benefits, community needs and forecasting of future materials in the waste stream.”
Page 111 (“Roles and responsibilities”): Add businesses that make and sell the products to the discussion of the “private sector.” These businesses have roles in the action since they sell the products that become waste and contribute to environmental impacts.	The beginning of the paragraph has been amended to: “Businesses make and sell products and are identified in this plan as having responsibilities related to reducing the environmental and human health impacts of their products and in managing these items at the end of their use. In addition, for-profit businesses...”
Page 123 (“Acknowledgments”): Under Technical Work Group members/Healthy Products, Ali Briggs-Ungerer’s affiliation is missing and has been replaced with Minal Mistry’s name and affiliation, which should be on a separate line.	Mr. Minal Mistry’s name and affiliation have been moved below Ms. Ali Briggs-Ungerer’s name, on a separate line.

Suggested Change	Revised Plan Text
Page 81 (“Keeping it Separated”): The graph should not have contamination rates from the single-family and multifamily sectors stacked on top of each other.	The bar chart on page 81 has been replaced with two charts separately showing the contamination rates found in Metro’s single-family and multifamily waste characterization studies.
Action 6.5 might be the right place to include recognition programs for work to reduce food waste or other waste at businesses.	The plan has been revised to include an action under goal 6 that states, “Implement recognition programs for business efforts to prevent waste and minimize the environmental impacts of the products they purchase.” Cities and counties are identified as the lead agency for this work.
Actions 6.3 and 6.5: “Residences,” “households” and “businesses” are frequently mentioned; should the plan also reference “schools,” or should these be included with “institutions?” This could recognize some of the technical assistance and infrastructure work going on at schools (e.g. Eco-Schools Network).	The plan was revised to include the following definition of “business” in the glossary: “Any entity of one or more persons, corporate or otherwise, engaged in commercial, professional, charitable, political, industrial, educational, or other activity that is non-residential in nature, including public bodies and excluding businesses whose primary office is located in a residence.”

In addition to the revisions made to the draft plan in response to public comments, the following revisions were made based on staff review of the plan.

New action added under goal 12

Metro staff discovered an action that had been drafted by the Garbage and Recycling Operations Technical Work Group, had been inadvertently left out of the final set of actions included in the draft plan. The following action was added to the plan:

- 12.8 Evaluate, on a continuing basis, the need to regulate different types of solid waste facilities not covered under current Metro regulation based on their actual and potential impacts on human health, the environment and neighboring communities. These facilities include, but are not limited to, dismantlers, wood waste grinding operations, landscapers, sludge processors, and specific or single material recyclers.

Plan definition

To provide additional clarity to the intent and role of the plan document, additional narrative to describe the plan was added to page 6 and page 29.

Page 6 The plan is a policy document that sets direction across the 12 years the plan will be in effect.

Page 29 The plan’s goals and actions set policy direction throughout the life of the plan.

Non-substantive changes

Metro staff made further revisions to the plan to address non-substantive items including corrections to names and affiliations, revisions to images and graphics and other minor grammatical edits.

The final draft version of the plan is available online at: oregonmetro.gov/regionalwasteplan

NEXT STEPS

Metro staff will present the final draft plan to the Metro Policy Advisory Committee on January 23, 2019 for review and comment. Metro Council will hold two public hearings on the plan beginning in late February 2019. Public testimony will be accepted at the hearings to provide an additional opportunity to comment on the final draft of the plan. Dates and times can be found online at oregonmetro.gov/regionalwasteplan or by calling 503-797-1700.

APPENDIX: PUBLIC COMMENT SUBMISSIONS

Entry	Date	Name	Zip code / City	Comment
1	11/21/2018	Heidi Barth	97206	Food is currently purchased in disposable containers, most of which is plastic. Food needs to be sold in biodegradable or reusable materials, especially dairy products. Portland used to have a dairy with a drive through retail outlet, Senn's, where milk was sold in returnable glass containers. Additionally, coffee to go should not be sold in disposable containers. Imagine what this alone is doing to our planet!
2	11/21/2018	Stephanie Millar	97219	Return to weekly garbage pick up. Return to pre sorted recyclables. Pre sorting at home will help people keep track of what really is recyclable, and weekly pick up will reduce temptation to toss things in recycle just because your trash bin is full. Also, my teens and housekeeper seem unable to learn what is and isn't recyclable because they don't have experience with home sorting. In my office, I see people throw pens and binder clips into the paper bin and when I say not to they say- that's OK, they sort it all. Return to basics and personal responsibility.
3	11/23/2018	Norene Hough	97205	I think there are many great ideas in this plan. It is not clear how the changes (or even the current initiatives) will be communicated to households. I live in an apartment and rarely get key information from metro (how to reduce consumption, like what is recyclable, where can I take other items). Can this be given out with every new lease? How will information be given to residents?
4	11/23/2018	Norene Hough	97205	In my neighborhood, with many apartments we have so many different haulers that each only deal with specific contracts/ locations. This seems very wasteful. We have haulers 6 days a week all idling while they only pick up a small section of the neighborhood. This impacts air pollution, traffic, noise pollution etc. I understand that each building has selected a provider but it would be better to have a providers bid for contracts for parts of the city and have the buildings pay metro for a more streamlined process instead of the private haulers.
5	11/24/2018	Linda Martin	97280	One of the most important things to me and so many of my neighbors that post on NextDoor, is the lack of recycling options for #1 plastics (clamshells, etc.)..... please, please, please help us find a way to recycle this kind of plastic! Many of us are saving it up hoping that we can find an option soon. This is the most prevalent plastic, and it's being dumped into our environment! It is pretty near impossible to avoid, no matter how hard we try! I really hope that Waste Management can find a solution to this problem.

Entry	Date	Name	Zip code / City	Comment
6	11/25/2018	Chris Streight	Portland	I would hope that aside from items we can compost in our yards, we should be recycling nearly everything else. I am astounded by the number of items (mostly plastic) that I now throw away that I used to be able to recycle, both at the curb and taking it to metro. Now it seems very little is recyclable. I would like to see a ban on the packaging that isn't recyclable either at the curb or by taking it somewhere local that has many locations. If we can't do this, then we need to stop making it. I am already trying to do my part by not buying lettuce and such in plastic containers. This needs to stop.
7	11/26/2018	Ralph Cohen	97219	There is no mention of converting combustible but non recyclable waste currently disposed in landfills into electric energy by burning such as is done near Salem by Covanta (https://www.covanta.com/Our-Facilities/Covanta-Marion). While I agree totally that we want to minimize landfill waste and recycle/reuse more, as long as landfills are used, there is going to be waste that could be converted to electric power. This could displace coal or natural gas being used for the same purpose. The idea should at least be considered and evaluated. The other point that would be helpful to address is in "implementation" where funding is required to establish indicators - how much and by what means will funding be obtained? Otherwise, the study is thorough if a bit optimistic. Well done.
8	11/26/2018	Wayne Brooks	Portland	<p>I have taken time to read the plan and have some comments that I think might improve or at least add to the plan. First, I like the plan and am proud to be a citizen offering my two cents.</p> <ol style="list-style-type: none"> 1. Good jobs. Re; pay living wages. I think you should go a step farther. I suggest that the highest paid job must not exceed a certain multiple of the lowest job including benefits. See Ben and Jerry's and Bob's red mill as examples. 2. Product Design; Companies that sell excess packaging should have to take it back and have a plan for recycling it. 3. If there is a product that can't be recycled such as product lids and caps, pizza boxes, and waxy cups and packaging then why is it being allowed to be sold in our state. Remember Reduce, Reuse and Recycle. 4. Help develop a pizza box that customers can purchase and wash and then use it to pick up your next pizza purchase with a discount for saving the store from using another box. 5. Dangerous chemicals the goal must always be to protect our wetland, watersheds,

Entry	Date	Name	Zip code / City	Comment
8	11/26/2018	Wayne Brooks	Portland	<p>streams and seas both upstream and downstream from pollution. Zone agricultural and industrial land to protect waterways from animal waste, Agricultural input runoff and industrial waste.</p> <p>6. No recyclable product should have any label or marking that stops it from being reused and/or recycled.</p> <p>7. I think that having a Master Recycler program in local Neighborhoods is a great idea.</p> <p>8. All glass wine and spirits included should be included in the bottle bill. All bottles should be able to be cleaned and reused in addition to being reformed.</p> <p>9. Bus Stops should be required to have garbage collection that is kept clean and serviceable.</p> <p>10. No caps or lids should be allowed to be sold that are not recyclable.</p> <p>11. I am not sure how to word this but Metro should lead in not just collecting but also take a lead in research and development of recycling systems as these ideas may be job producers in our state.</p> <p>12. If there are products that we buy that cannot be recycled you need to ask why and how can it be changed.</p> <p>13. Be more aggressive in expanding the bottle bill it should make sense and not beer bottles and pop cans but not other glass and cans. We are after all talking about the future of our planet for our kids and grandkids.</p> <p>14. We should be mining old landfills to get recyclables back into the waste stream.</p> <p>15. Wastewater sewage and composted materials should be available to be purchased by farmers and the gardening public.</p> <p>16. We should have stronger plans to disconnect rainwater runoff from the sewer system. Streets and parking lots should be permeable.</p> <p>17. Housing should have rainwater and grey water collection systems as part of our building codes.</p> <p>18. Restaurants should have recycling areas and a place to empty beverage containers to ensure that ice and excess product gets returned to treatment plants and not just sealed up in a plastic bag and sent to a landfill.</p> <p>Thank you for allowing me to offer this input I hope that it may be of some value.</p>

Entry	Date	Name	Zip code / City	Comment
9	11/26/2018	Mike Mercer	97211	Overall, it the plan looks good and I particularly like the systems approach used in it's development. All items seem important, and I hope there is a way to prioritize goals to ensure we address and effectively spend \$ on those goals that have the largest overall impact. I didn't see anything on trash generated by the homeless population. I understand there is work being done with our homeless community members to reduce the amount of trash generated and made visible through lack of disposal options. I may have missed it in my scan, but is there something Metro and other regional municipalities could do to create thriving, local markets for our recyclables? Thank you. Mike
10	11/26/2018	Kevan Anderson	97219	Excellent work! Thank you for sharing the draft. You have identified a dizzying number of goals and action items with so many "investment needed." It is a steep hill to climb but with good leadership and the commitment of the public, I hope to see the region making great progress. Courage!!
11	11/30/2018	Arlen Sheldrake	97221	Really, you expect me to read a 152- page document and then comment on it? I consider your request to be a sham.... If you were serious, you would give me a summary and then ask me to respond to some questions or statements.
12	12/1/2018	Elaine Soljaga	97239	We must provide systems to support a comprehensive plan, to include: All commercial properties (including apartments) should be required to provide recycling. All food service businesses should be required to divert organic material.
13	15/5/2018	Terrell Garrett	97267	[INCLUDED BELOW ON PAGES 38 AND 39]

**TERRELL GARRETT
GREENWAY RECYCLING, LLC
15204 SE RIVER FOREST DR.
MILWAUKIE, OR 97267
(503) 793-9238
5 December 2018**

Metro
600 NE Grand Ave.
Portland, OR 97232

Re: Public Comment on draft 2030 Regional Waste Plan

To Whom It May Concern:

Goal 2.1 is admirable in its effort to cause portions of the solid waste spending to go local with emphasis on minority and women owned businesses. However, this goal stops well short. This goal should extend well past the small amounts available through government contracting with the goal of significant local participation through ownership in all facets of the collection, processing, and transfer systems.

Goal 16.4 should add the word "current" between "Maintain" and "public".

Goal 16.5 should evaluate the feasibility of any facility in Washington County. While the verbiage does not preclude a private-owned facility to perform these functions, Metro Staff is acting as if it does. Whenever a private entity can responsibly perform a public service it should be allowed to do so in preference to government provision of those services. This should be incorporated into 16.5.

Sincerely,



Terrell Garrett

From: Terrell Garrett [mailto:greenwaybusiness@gmail.com]

Sent: Wednesday, December 05, 2018 12:28 PM

To: Roy Brower; Matt Korot

Subject: 2030 Regional Waste Plan

Since I can't find where to email my comments, I am broadcasting them in hopes that someone files the attached comments.

Unfortunately, by email you are forced to use Outlook and I don't use Outlook.

Thanks,

Terrell

Entry	Date	Name	Zip code / City	Comment
14	12/8/2018	Amanda Scheetz	N/A	<p>One of the things that I wrote just very briefly is that I'd like to see more trash cans in the city. One of the things that I've noticed that the actual function of them makes them not user friendly. While it's a good idea that it's a trash compactor, you almost feel like you're going to get a disease...From touching it! Um pulling down the handle... it goes so far down and then trying to get the garbage in. It's very dirty. As well as... I'd like to see the option to have a recycling you know, so if it's a garbage can, also with a recycling area with it.</p> <p>...</p> <p>I had another idea or another thought. I'm not EXACTLY sure what it all entails 'cus I'm kind of new. But one of the things that I've come across is having uh a better understanding of what is actually recyclable. At home as well as uh . . . the ease of it. Does that make sense? I know they've got like pictures but actually like knowing "oh your pizza box that you're putting in doesn't actually go into the recycling like you're thinking."</p> <p>...</p> <p>This might just be a little too far out there but... at home recycling... receptacles for like the in home. You know, not just the big bulky ones that people keep in the garage, but even something. Do you guys have anything like that?</p>
15	12/8/2018	Bella Gurvich	N/A	<p>I want to say. We not enough talking about compost. Because I just realized... not for a long time ago... carton from pizza I can't put all this carton to recycle. This part not clean part. I thought I know everything but it's always we can to do better. And more. And this part of carton... this is uh grease I can't put to recycle. And I can put this to compost. I hear this by TV. Local news. It was very good they doing this. People can understand better because they explain and show everything. And we must to think about compost more. What we can put some carton maybe because people don't know. Maybe don't think about this.</p>

Entry	Date	Name	Zip code / City	Comment
16	12/8/2018	Diane Williams	97212	<p>Hi. It's like you... They were saying you know that the plastic issue, you know. And, uh I was seeing in Tigard they are taking plastics and recycling them and stuff. I was wondering if there was any way that Metro could reach out and have like certain places in town where they could be picked up you know the plastics that we're all having fits about, you know? And she was saying "B-Line" comes and picks it up. But, um, and they take it out to Tigard and they recycle it and why can't that be part of our solution with plastics?</p> <p>...</p> <p>But you know. A lot of this stuff... if we had a shredder or something just to make it smaller. People are making shirts, clothes, everything out of this stuff now. I couldn't even believe some of the coats and stuff they're making out of this stuff. So, um, maybe we'll be able to make building materials since the housing... and explore the housing industry, you know. If they can't make it out of clothes, maybe they can put it into some of their products that they're building (buildings and stuff) with. Especially since this earthquake it's going to give a little boom...</p>
17	12/8/2018	Semion Gurvich	N/A	<p>Я участвую в этом по работе уже длительное время. [Intrepreter: I'm participating here for a long time.]</p> <p>Да, и я считаю, что я ознакомился с документами. [Interpreter: I read through the whole document.]</p> <p>Да, и что это хороший план, если он будет реализован полностью, как намечено. [Interpreter: And I believe it will be a very good plan if it will be applied in the whole piece. All the details will be included.]</p> <p>И радуется профессиональная работа всех групп Metro... [Interpreter: And it's very heartwarming the professional work of the whole group.]</p> <p>И отношение к представителям разных общин. [Interpreter: And also warm attitude toward all the diversity cultures.]</p> <p>Спасибо большое. [Interpreter: Thank you.]</p>

Entry	Date	Name	Zip code / City	Comment
18	12/11/2018	Susan Troup	97201	I live in Project Based Section 8 housing in downtown Portland. We are not able to compost. We have no way to recycle electronics. Our recycle bins are so polluted with non-recyclables that I suspect most of it winds up in the landfill. There is no education program in the building to address this problem. A lot of the residents do not speak English.
19	12/11/2018	Vance Lizza	Wood Village	There needs to be a method for serviced households to, in an environmentally safe way, dispose of small batteries and non-incandescent light bulbs. As things are now, too many cannot be troubled to search for such a thing; it is infinitely easier to simply throw such items in the regular trash.
20	12/12/2018	N/A	97202	I have a difficult time finding places to dispose of household batteries. It would be great if there was a place at your facilities to do so. Also, I strongly support continuation of the household hazardous waste drop-off days. They are great for getting rid of paint, cleaners and other things I can't put in my trash.
21	12/13/2018	Robert Fortner	N/A	[INCLUDED BELOW ON PAGES 43-45]

The "Recycling Receipt" provides recycling instructions for each packaging component of each product purchased. Intended to augment existing electronic receipts at grocery stores, the Recycling Receipt might look like this:



Recycling Receipt

QTY.	ITEMS
1	ORGANIC APPLESAUCE 6PK
	Recyclable Foil seal
	Garbage Plastic bottle (<6 ounces)
	Recyclable Paperboard carrier
1	HOUSE SPICE SHICHIMI TOGARASHI
	Garbage Plastic screw cap
	Recyclable Glass bottle
1	BOLIVAR BITTERS
	Garbage Plastic shrink band
	Garbage Eye Dropper
	Recyclable Glass bottle
1	ORGANIC APPLE JUICE 4PK
	Garbage Plastic straw
	Recyclable Tetrapack
	Garbage Cellophane wrapper/package

The current prototype contains the packaging components and their recyclability status for over 2,100 grocery products. Additional resources would make it possible to cover entire grocery stores, first in Portland and eventually nationwide.

A cell phone app would allow consumers to scan barcodes themselves to decide whether to buy a product based on its packaging or to answer the sometimes difficult question of whether something should go in the trash or recycling.

Direct instruction on what can and cannot be recycled will reduce contamination rates. And by providing consumers with packaging facts, they can vote with their wallets and switch to more sustainably packaged products. Producers will respond to consumer demand by migrating to packaging systems with better environmental profiles, perhaps in line with analyses of packaging materials performed by DEQ.

Future versions of the Recycling Receipt will go beyond packaging and end-of-life to address full life cycle costs by showing, for example, the greenhouse gases associated with making a particular product.

The Recycling Receipt responds directly to multiple goals in the 2030 Regional Waste Plan:

Goal 6: Reduce product environmental impacts and waste through educational and behavioral practices related to prevention and better purchasing choices.

Goal 7: Reduce product environmental impacts and waste through policies that support prevention practices and better purchasing choices.

Goal 9: Increase knowledge among community members about garbage, recycling and reuse services.

9.1 Provide culturally responsive education and assistance for garbage, recycling and reuse services to residents and businesses.

Goal 15: Improve the systems for recovering recyclables, food scraps and yard debris to make them resilient to changing markets and evolving community needs.

15.1 Implement regionally consistent contamination reduction efforts to improve material quality, including education, collection equipment changes and customer feedback methods.

15.2 Regularly assess the list of curbside recyclables collected in the region relative to end-markets, life cycle environmental benefits, community needs and forecasting of future materials in the waste stream.

For these reasons, it might possibly make sense to include the Recycling Receipt in the 2030 Regional Waste Plan.

Thank you very much.

-Bob Fortner

Entry	Date	Name	Zip code / City	Comment
22	12/14/2018	Thane Tienison	97201	[INCLUDED BELOW ON PAGES 46-48]

**LANDYE BENNETT
BLUMSTEIN LLP**
ATTORNEYS

THANE W. TIENISON
ttienison@lbbblawyers.com
Admitted in Oregon and Washington

RECEIVED
DEC 17 2018
OFFICE OF METRO ATTORNEY

December 14, 2018

Metro Regional Waste Plan
600 NE Grand Avenue
Portland, OR 97232

Re: Comments on Draft 2030 Regional Waste Plan

Dear Metro:

These comments are submitted on behalf of Asean Corporation, a Portland based company, that manufactures and distributes compostable serviceware and certified compostable trash and take-cut film bags. Asean's Stalk Market products are recognized as one of the very few reliably compostable serviceware products in the U.S., all of which are certified as complying with the ASTM D6400 and D6868 specifications for certified compostable products. These two ASTM standards are internationally recognized and incorporated in the labeling laws of at least two states and many governments throughout the United States.

A central component of the draft 2030 Regional Waste Plan deals with the life cycle of products and materials. Goal 5 deals with product design and manufacturing, and the actions identified to "reduce the environmental and human health impacts of products and packaging that are made, sold, used, or disposed in Oregon" are in § 5.1. That section provides for the need to

Advocate for legislation that minimizes chemicals of concern in products and packaging and requires the disclosure of product chemical data to consumers.

Section 5.3 identifies that it is important to

Partner with the State of Oregon to provide incentives to manufacturers for developing sustainable manufacturing techniques, including green chemistry, for products and packaging sold in Oregon.

Goal 8 deals with product end-of-life management, the goal of which is to "increase the reuse, repair and donation of materials and consumer products," and is identified as an action item in § 5.4 to

Advocate for product stewardship legislation and other policy approaches that can achieve the greatest reduction in environmental and human health impacts from products and packaging made, used, or disposed in the region."



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Page 2

Goal 10's purpose is to "provide regionally consistent services for garbage, recyclables and other priority materials that meet the needs of all users" identified as an action item in § 10.8 is the need to

Advocate for statewide legislation or implement regional policies to increase the types of products and packaging for which manufacturers and retailers provide environmentally sound, convenient and accessible take-back programs.

Finally, Goal 15's purpose is "to improve the systems for recovering recyclables, food scraps and yard debris to make them resilient to changing markets and evolving community needs" identified as an action item in § 15.5 is the need to

Facilitate the permitting of composting facilities to process mixed residential yard debris and food scraps, while ensuring minimal impacts on neighboring communities.

In § 15.8, the recommendation is to

Advocate for statewide policies or implement regional policies that create a preference, incentive or requirement for use of recycling end-markets in Oregon and the Northwest.

Members of the SWAAC in meetings advocated for the adoption of statewide standards for plastic products, among other issues.

We support all of the identified goals and recommendations mentioned above and echo the sentiments of those members of the SWAAC and the public that support those statewide standards.

To that end, on behalf of Asean, we recommend that the 2030 Regional Waste Plan include, as an action item, the adoption of statewide legislation establishing standards for compostability similar or identical to those adopted by the State of California and set forth in California Public Resources Code §§ 42355-42357, which establish statewide standards in California for compostable plastics (ASTM D6400), non-floating biodegradable plastics in the marine environment (ASTM D7801), and biodegradable plastics used as coatings on paper and other compostable substrates (ASTM D6868). That legislation adopted in 2015 by the State of California has proved quite effective in greatly limiting, if not eliminating, the advertising for sale of falsely labeled biodegradable and compostable plastics and

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increased the success of composting post-consumer food scraps to include certified compostable products. Similar standards have been adopted in Maryland and by the City of Seattle and are much needed because of the large number of products on the market which are labeled as "compostable," "biodegradable" or "recyclable," when, in fact, they are not so and do not comply with ASTM specifications. In that regard, California, for example, recently entered into a settlement with Amazon.com extracting over \$1.5 million in civil penalties to obtain a consent order obligating Amazon to ensure that the plastic products advertised for sale through it and labeled as "biodegradable" or "compostable" or some similar term did, in fact, meet the ASTM legal standards adopted by the state. These standards have not been adopted in Oregon, but they need to be, and we believe that doing so will help promote the above identified goals in the Regional Waste Plan.

For that reason, we respectfully request that they be considered for adoption with the action items identified above. Thank you for your consideration.

Sincerely,



Thane W. Tienison

/jz

cc: Matt Korot, Chair (by email)
Ernest Hayes, Council Policy Coordinator (by mail)
Councilor Sam Chase (by mail)
Client

Entry	Date	Name	Zip code / City	Comment
23	12/15/2018	N/A	97200	Metro needs a partnership with ODOT that allows them to pick up dumped garbage on ODOT property. Referring reports of illegal dumping often does nothing —ODOT lets dumped garbage that's been reported sit for months sometimes. ODOT clearly doesn't care, but I get the impression that Metro does. The system isn't working.
24	12/17/2018	Rob Nathan	97212	I am very pleased with how thoughtful Metro has been during the development of this plan. I particularly like its commitment to racial equity and leading with race. I look forward to seeing the outcomes of this plan take shape.
25	12/17/2018	Emma Brennan	97227	I am thrilled this document. I loved seeing the inclusion of equity as a major component of this plan. This is what good governance looks like!
26	12/17/2018	Sage Cerulean	97045	I would like to see composting services be available to residents in Oregon City. Also needle collection areas like in Portland are needed as people have shared on social media seeing needles on the ground in different parts of the city. I'm not sure what else at this time.
27	12/21/2018	Jannike Allen	97201	It is heartening to see Metro take steps to improve the waste system. While visiting a waste sorting plant in Oslo, Norway, I was repeatedly told how important it is to view waste as a resource. In Oslo, it truly is a resource (food waste gets turned into biogas to power city busses and biofertilizer for use on nearby farms, plastic is collected separately to send by train to recycling facilities, and remaining waste is incinerated to create power for heating buildings). A caution that can be taken from the system in Oslo is that much effort needs to be focused on training people to sort, which requires fostering a culture of viewing waste as a resource. Their system involves distributing green and blue bags that people can pick up at grocery stores so that at home they can put food waste in the green bags and plastic in the blue bags. This is so that the blue and green bags can be collected with the regular trash, as sorted by machines that recognize color to divert them to different pathways. We can't afford to forever throw away the nutrients in food waste and other organic matter. As a society we need to combat our addiction to plastic, and recycle the plastic that is already here- which requires clearer messaging to consumers so that they know how to avoid contaminating loads of recyclables. Metro should look into the options around incineration, since it provides an opportunity to reduce space required in landfills (certain ash even being able to be dispersed instead of contained if it is not toxic), and retrieving value from waste that would otherwise be useless (creating energy). It is great that Metro is working on bringing together stakeholders to figure out what works in our region, and I think a lot of ideas can be gained from models elsewhere.

Entry	Date	Name	Zip code / City	Comment
28	12/20/2018	Joe Zehnder	97201	[INCLUDED BELOW ON PAGE 50]



Bureau of Planning and Sustainability
Innovation. Collaboration. Practical Solutions.

December 20, 2018

Dear Metro 2030 Regional Waste Plan Team,

On behalf of the City of Portland Bureau of Planning and Sustainability, I am pleased to submit comments on the Draft 2030 Regional Waste Plan.

Plan and planning process are commendable

Rarely have we seen this type of intense effort to engage a diverse set of stakeholders on a wide-reaching array of actions. Your work within the community, particularly in low-income and communities of color, has created a strong foundation for future collaboration. Portland City Council adopted a Waste Equity Plan in October 2018 and we believe that working together we can make important progress in this area.

Values, principles and vision express shared intent

Your team adeptly identified a need to realign our focus areas on what matters most to people in our community. The Values succinctly describe the purpose of the Plan and clearly show Metro's renewed commitment to the community. Your leadership in reimagining the role, opportunities and vision for a regional waste system will help guide our strategic thinking and ground new visions for the future. Given your collaboration with community stakeholders, we have confidence that this work represents the interests and shares an expression of intent of our community.

Goals and actions provide actionable pathway

Many of the goals and actions provide a clear framework for moving ahead. However, there are some actions that are less clear, could potentially be costly to implement and may bring unintentional consequences for residents and businesses (examples 10.1, 14.1, 14.3, 14.4, 14.7). If some actions are selected for further consideration, then conducting research into underlying assumptions on the solutions would be needed. We believe that, together, we can meet the intent of the actions.

Thank you for this opportunity to comment and for all your efforts. Our staff looks forward to working with you to implement the adopted Regional Waste Plan.

Regards,

Joe Zehnder
Interim Director



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Entry	Date	Name	Zip code / City	Comment
29	12/21/2018	Beth Vargas Duncan	97308	[INCLUDED BELOW ON PAGES 51-53]

From: [Beth Vargas Duncan](#)
To: [2030 Regional Waste Plan](#)
Cc: [Mike Lechner \(Mikel@pridedisposal.com\)](#); [Dean Kampfer](#); [Kristan Mitchell](#)
Subject: WCHA 2030 Regional Waste Plan Comments to Metro
Date: Friday, December 21, 2018 1:35:52 PM
Attachments: [Metro 2030 Regional Waste Plan Comments from WCHA.pdf](#)

Good afternoon,

The Washington County Haulers' Association submits the attached letter as their comments to the 2030 Regional Waste Plan. Given the timing between Metro's release of the full draft 2030 Regional Waste Plan last month and the meetings of the Portland Haulers' Association and Clackamas County Refuse and Recycling Association, I expect those associations will be able to send a similar letter to the Metro Council next month.

Please do not hesitate to contact me with any questions or concerns.

Thank you,
 Beth Vargas Duncan
 Regional Director
 Oregon Refuse and Recycling Association
 PO Box 2186
 Salem, OR 97308-2186
 Cell: 971-707-1683
bethvd@orra.net
www.orra.net

December 21, 2018

Metro Council
600 NE Grand Avenue
Portland, OR 97232- 2736

RE: Metro 2030 Regional Waste Plan

Dear Metro Councilors,

This letter represents Washington County Haulers Association's (WCHA) member comments on Metro's 2030 Regional Waste Plan. As you know, member haulers provide services across the solid waste system including hauling, resource recovery & transfer, processing and landfilling for all areas of the Metro region. Members are committed to working cooperatively with their regulatory local governments to provide safe, modern, and efficient waste collection services that include garbage, recycling, and organics collection at reasonable rates.

Member haulers appreciate all of the work representatives of Metro, community members, and industry stakeholders have contributed to create the 2030 Regional Waste Plan. In reviewing the Plan members hold similar values and more specifically, the haulers support concepts

- promoting safe, reliable, responsive, and affordable services accessible to all persons
- expanding diversity, equity, inclusion within the industry
- reducing adverse environmental impacts and
- reducing waste.

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. More recently, members and local governments are taking action to increase education outreach regarding recycling contamination in an effort to improve marketability of recyclable commodities and the opportunity for them to be recycled. Similarly, members are committed to working with local government partners in expanding mechanisms for the recovery and diversion of food waste.

As the Plan process continues, please note that member haulers also support most of the concerns and comments local government representatives have already provided such as local government authority to set collection rates and determine appropriate service levels for their community. Some regional consistency may be appropriate, but not for all areas, as smaller communities don't have the resources and increasing some requirements for them could actually create barriers. As a result, it is important to consider economic impacts and related cost benefit analysis for the action items.

In conclusion, member haulers provide these comments to demonstrate our strong commitment to work with Metro, local government, and others in the community and share our expertise in the

industry. Clearly, member haulers want to be active in the development and implementation of the Plan action items. We look forward to 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 within a volatile economic climate while promoting our common values advancing equity and reducing barriers for minorities and women to enter or continue growing a business or career in waste management.

Sincerely,

Beth Vargas Duncan,
Regional Director (Representing Washington County Haulers' Association)
Oregon Refuse and Recycling Association
PO Box 2186
Salem, OR 97308-2186
bethvd@orra.net

Entry	Date	Name	Zip code / City	Comment
30	12/21/2018	Peter Brandom	Hillsboro	[INCLUDED BELOW ON PAGES 53-55]

From: Peter Brandom <Peter.Brandom@hillsboro-oregon.gov>
Date: December 21, 2018 at 3:34:07 PM PST
To: Marta McGuire <Marta.McGuire@oregonmetro.gov>
Cc: Andy Smith <Andy.Smith@hillsboro-oregon.gov>
Subject: RE: Draft 2030 Regional Waste Plan available for review

Marta,

Attached are our staff level comments. As I requested at SWAAC, we would like at least one more month to allow for a more comprehensive internal review, including by our elected leadership. With our new Council inheriting the Plan, we would much prefer the opportunity for them to review the Plan.

Thank you,
Peter

Peter Brandom | *Senior Project Manager*
City of Hillsboro, Oregon
phone 503-681-6191
email peter.brandom@hillsboro-oregon.gov
web www.hillsboro-oregon.gov | Twitter [@cityofhillsboro](https://twitter.com/cityofhillsboro)

Draft Regional Waste Plan Final Review – Hillsboro Comments

General Comments:

- The timeline for this comment period (three weeks total to provide input at SWAAC, and one month total for the review period) is insufficient to realistically schedule briefings with City leadership to garner their input. We ask that Metro extend the deadline a minimum of one month so that we have time to get input from leadership.
- Related to the above, we have elected leadership turnover, and given that the plan will be adopted when they are in place, we strongly feel it is appropriate to give them the opportunity to also review and comment on the draft plan. Please extend the review period to accommodate this need as well.
- The plan must ensure transparency in rate setting at all facilities that receive waste generated within the region.
- The plan must prioritize the completion of the solid waste system infrastructure and services to ensure equitable access to facilities and services.
- The plan must estimate cost impacts of actions over the duration of Plan. Not specifically, but at least order of magnitude. This comment has been voiced before, and there appears to be no new effort to estimate cost impacts of the Plan.

Detailed Comments (actions for which we do not have specific comments have been omitted).

Updated comments are in red; black print are comments that were submitted during earlier iterations of the draft Plan:

2.1 Need to understand details of how this will work.

2.2 Generally supportive, but need more detail and clear objectives.

2.3 Need an estimate of cost impact.

3.1 Need an estimate of cost impact.

3.3 This action seemingly should precede 3.2.

5.3 Need an estimate of cost impact.

6.6 Should strongly reconsider pinning efforts to one organization and especially website; these can change often in 10+ years.

7.1 Determination of 'low environmental and human health impacts' must be well informed by appropriate agencies/entities. Should list DEQ as lead here?

10.1 Should only mandate when the regional infrastructure is complete and equitable. Until such time should not list action as directive.

10.3 Must understand the cost impact. Will likely be major impact.

10.4 First ensure that infrastructure supports the objective. Why is this one not directive?

10.5 Need an estimate of cost impact.

December 21, 2018

10.6 This must be done locally, not regionally. Please ensure clarity that specific standards will be set by cities and counties, not Metro.

11.6 Need an estimate of cost impact.

12.3 Need an estimate of cost impact.

14.1 We feel strongly that the explicit assumption is that 'consistent' processes do not necessarily mean the 'same'. There are too many variables and local requirements/authority to expect sameness.

14.3 This should be up to the local government; do not require, but guidance and best practice is welcome. As with 14.1, please be explicit that 'consistent' is the goal, rather than 'same'.

14.4 Need an estimate of cost impact. Local governments retain authority to determine whether and to what extent to implement program.

14.6 Unnecessary for collection, this is already done locally.

15.4 Generally support objective; need an estimate of cost impact.

15.10 Generally do not support higher tip fees; already among the highest in the U.S.

16.5 Support.

Indicators:

Strongly suggest that indicators be deliberately put forward as 'initial' and provide for flexibility and adaptation through the early stages of implementation. Quality and availability of data will change, and the Plan should be flexible to include the best indicators to gauge progress.

Entry	Date	Name	Zip code / City	Comment
31	12/21/2018	Audrey O'Brien	97232	[INCLUDED BELOW ON PAGES 56-59]

From: OBRIEN Audrey <Audrey.OBRIEN@state.or.us>
Sent: Friday, December 21, 2018 5:35 PM
To: Marta McGuire; Luis Sandoval; Matt Korot
Cc: HOUGH Daniel; ALLAWAY David; DAVIS Shannon
Subject: DEQ comments on Metro Regional Waste Plan
Attachments: 20181221-commentonMetroRWP.pdf

Marta,

Attached are DEQ's comments on the Metro Regional Waste Plan. Please let David Allaway or me know if you have questions on any of the comments.

DEQ appreciates the opportunity to comment. Metro's process to develop this plan and the community engagement is exemplary. DEQ supports Metro's process and plan and looks forward to working with Metro as Metro pursues the goals and activities identified in this plan.

Sincerely,

Audrey O'Brien
 Manager
 Northwest Region Environmental Partnerships
 Oregon Department of Environmental Quality
 700 NE Multnomah Street, Suite 600
 Portland, OR 97232
 503-229-5072 (office)
 503-209-9182 (cell)



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region
700 NE Multnomah Street, Suite 600
Portland, OR 97232
(503) 229-5263
FAX (503) 229-6945
TTY 711

December 21, 2018

Marta McGuire
Metro
600 NE Grand Avenue
Portland, OR 97232-2736

Dear Marta,

Thank you for the opportunity to provide DEQ's feedback on the latest draft of the Metro Regional Waste Plan. DEQ appreciates and applauds the process that Metro has used to develop the plan. Metro staff and management have made a very sincere and concerted effort to develop this plan to reflect the needs of the broader public, to make meaningful efforts to address historic and current inequities (specific to race), and to broaden the region's focus from "waste" to sustainable materials management. There are several references to the DEQ 2050 Vision and an expressed desire to align with it. The document is also very nicely organized and presented and easy to read. The Draft 2030 Regional Waste Plan points Metro in a good direction and deserves our support. DEQ appreciates the openness that Metro has demonstrated in meeting with DEQ and being receptive to DEQ's suggestions throughout the Metro process of developing the plan.

Here are specific observations, questions and suggestions:

Page 6 (Introduction): the first paragraph on this page is elegantly written and demonstrates a firm understanding of - and commitment to - principles of sustainable materials management.

Page 11 ("Addressing the full life cycle"): DEQ suggests that the first paragraph may more accurately reflect how the life cycle can be explained if written as follows: "Our regional waste system is one piece of an integrated whole that covers the entire life of the products we use, from design to production to use, until they go to a recycler, landfill or thrift store." Perhaps Metro could add the following to strengthen the linkage between different stages of the life cycle: "Decisions about how wastes are managed can impact design and production upstream of the consumer, and the region can further impact upstream decisions through material selection and waste prevention."

Further, the remainder of the text on page 11 might be strengthened by adding a sentence or two that justifies this broader/expanded approach. "By addressing impacts across the full life cycle of materials, the region can avoid unknowingly shifting environmental burdens (increasing impacts in one area even as we decrease the impacts of waste). And considering actions that can be taken across this full life cycle opens up additional opportunities to achieve our objectives."

Page 14 ("The life cycle of products and materials"): 2 references under "Product design and manufacturing" to "recyclable materials". DEQ's new research shows poor correlation between "recyclable" (packaging) and low

impact, so the references to designing with more recyclable materials as a “way to reduce harmful impacts” should be deleted.

Page 14 (“The life cycle of products and materials”): Under “Product consumption and use” consider adding restricting the sale of (or access to) high impact products as another example of how to reduce harmful impacts. This change would be consistent with at least one action later in the plan.

Pages 18 – 23 (“Environmental impacts of products and materials”): Thank you for effectively using DEQ data (material recovery survey and the consumption based emission inventory) and for a clear and compelling exposition of environmental impacts. Overall, the framing in this section is very effective.

Page 20 (“Environmental impacts of products and materials”): Subcaption of pie chart is not quite correct. DEQ asks that Metro change the subcaption to the following: “In 2015, the Metro region generated 41 million metric tons of greenhouse gas emissions from the products and materials we ~~made~~, bought, used and threw away and the services we used.”

Page 47 (“Vision”): Under “Garbage and recycling operations” does Metro mean to say it is minimizing pollution of air, solids and water” or “air, soils and water”? The reference to “pollution of solids” is not clear.

Page 51 (“Navigating the action tables”): Does Metro want to include State agencies in the description of Partnership agreements?

Page 51 (“Navigating the action tables”): Perhaps Metro may want to clarify that “existing programs” reflect that Metro has existing tools that could be used to carry out new actions. For example, Action 6.5 “Assist households and businesses in the adoption of practices that prevent the wasting of food and other high-impact materials” lists the implementation approach as “Existing programs” but what if Metro were to enter into new “Partnership agreements” which are used in existing programs but might be new ways to use existing tools to accomplish this new action? Similarly Action 7.4 states that implementation will be through “Existing programs” but there is huge potential for Metro to use many tools here such as Partnership agreements, Code changes, Legislative agendas, etc. For the many actions identified as “Existing programs”, the casual reader might assume that Metro intends no new work or programs, which may not be Metro’s intent. DEQ suggests additional clarification so that if Metro decides to grow an action out of an existing program into something like a “Legislative agenda” the plan is not restricting this by how the implementation action is interpreted or worded. This section “Navigating the action tables” would benefit from a note stating that the listed approaches are for illustration purposes and are not restrictive.

Page 81 (“Keeping it Separated”): The graph is very confusing. It suggests that 21% of garbage is non-recyclables from multi-family and an additional 9% is from single-family, for a total of 30%. DEQ recommends that these two sectors not be stacked on top of each other in this way.

Page 103 (“Measuring progress”): The list of key indicators is diverse and broad-reaching. DEQ supports the indicators identified. DEQ notes that the recovery rate is not listed.

Page 104 (“Measuring progress”): Under Goal 5, the second recommended indicator needs clarification. The goal (#5) is titled “Product design and manufacturing”. The indicator is “Share of priority products covered in

December 21, 2018
Marta McGuire
Page 3 of 3

Oregon by a product stewardship framework". Given that most product stewardship legislation focuses primarily on EPR at end-of-life, this may be an incomplete measure of reducing the environmental and human health impacts of products and packaging made, sold, used or disposed of in Oregon as most of the impacts are not subject to reduction via EPR.

Page 105 ("Measuring progress"): Goal 7: Why limit the indicator to only purchasing by government? Action 7.4 relates to the environmental impacts of the built environment, which are huge and also somewhat under the direct control, or at least subject to the strong influence of, Metro and local governments. DEQ recommend including an indicator about the life-cycle impacts of the built environment.

Page 111 ("Roles and responsibilities"): The discussion of "private sector" is limited to waste businesses as well as reuse and repair. DEQ recommends noting that businesses that make and sell the products that become waste contribute to environmental impacts and have roles in the actions.

Page 119 ("Plan oversight"): DEQ requests being included in the Regional Waste Plan Implementation Committee.

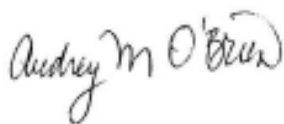
Page 123 ("Acknowledgments"): Under Technical Work Group members/Healthy Products, Ali Briggs-Ungerer's affiliation is missing and has been replaced with Minal Mistry's name and affiliation, which should be on a separate line.

Appendix 2, Pages 124-136, DEQ has reviewed and finds Metro's Waste Reduction Program and Plan to be approvable. As discussed, once adopted, DEQ intends to draft an approval letter and will issue a public notice of DEQ's intent to approve Metro's Waste Reduction Plan as required under ORS 459.055.

Pages 142 – 148 ("Glossary"): Some definitions conclude with what appears to be a source, while others do not. Consider being consistent and putting the source name in parentheses.

Again, DEQ appreciates the opportunity to review and provide comments. If you have questions about any of these comments, please contact David Allaway at 503-229-5479 or you can contact me at 503-229-5072.

Sincerely,



Audrey O'Brien
Manager, Northwest Region Environmental Partnerships Section

Cc: David Allaway, DEQ
Shannon Davis, DEQ
Daniel Hough, DEQ