

Multnomah County Solid Waste Regulatory System Final Report



**Submitted by Bell & Associates, Inc. in
association with Kies Strategies**

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Multnomah County Solid Waste Regulatory System Report

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Executive Summary

The objective of this project is to assist Multnomah County in determining an effective and efficient solid waste regulatory framework for unincorporated areas of the County. This work includes analyzing the benefits and drawbacks, including administrative costs to the County of various program scenarios, while also understanding the impacts on residential and commercial customers and the haulers that would be regulated.

Multnomah County seeks to ensure that the collection of solid waste in unincorporated areas of the county complies with applicable state and local regulations such as the Metro Regional Solid Waste Management Plan (RSWMP). The County has contracted with Bell and Associates (consultant) to help determine a regulatory approach to achieve this compliance goal while also balancing the impacts on residents, haulers, and County operations.

Methodology

The project involved review of regulatory requirements and the current waste and recycling collection and outreach programs. A meeting with representatives of collection companies known to be providing service in unincorporated Multnomah County was held with a follow-up survey on existing levels of service and service areas. During the course of the project the County also contracted for a customer satisfaction survey.

In addition to the data gathered in the surveys, the experience of the consultant in similar and neighboring jurisdictions was used to analyze the advantages and disadvantages of various scenarios to regulate collection services and comply with applicable regulations. Consultation with County leadership and staff research also informed the recommendations in this report.

Regulatory Scenarios

Four scenarios for regulating solid waste collection in the unincorporated area were evaluated. They included the following:

1. Service Boundary Extension - Work with neighboring jurisdictions to extend solid waste urban service area boundaries to cover unincorporated areas within the Metro Boundary.
2. Franchise - The County establishes geographic zones and assigns a hauler to provide exclusive service within that zone.
3. Contracting - The County, through a Request for Proposal (RFP) process, awards a limited number of contracts to a hauler(s) for the provision of waste collection services in a defined geographic area.
4. Licensing - A largely open market system that allows any hauler to provide service in unincorporated Multnomah County as long as they meet the conditions of the license.

Recommendations

While County staff and management provided considerable guidance and assistance in this project, their over-riding policy objective was to implement a regulatory system with the “lightest touch” possible, while still achieving compliance with applicable regulations. Staff recognized that there is a high level of participation and customer satisfaction with existing services. Moreover, regulating what is currently an open market system would have some impact on the rates paid by customers. Limiting rate impacts was one of the primary motivators behind finding a light-touch regulatory alternative.

Of the four scenarios considered by the County, licensing the current service providers in the County's open market system best meets the objective of ensuring that the collection of solid waste in unincorporated areas of the county complies with the requirements of ORS 459A and Metro's RSWMP, while also balancing the impacts on residents, haulers, and County operations. The primary reasons are the following:

- Licensing would provide the County the capacity to implement the regulatory framework without the need for a significant level of staff effort.
- Licensing would have the least potential impact on rates for customers.
- The current providers of collection service are providing the minimum levels of service required by the neighboring jurisdictions and there is a high level of customer satisfaction, obviating the need for more intensive regulation.
- Licensing alleviates the obligation of the County to set collection rates by maintaining the open market system that provides the haulers the ability to compete for customers and establish collection rates.
- Licensing is better suited to the fragmented geography of unincorporated Multnomah County, allowing the County to regulate haulers without assigning complicated geographic service areas.

Summary of the Contents of the Report

This report evaluates and presents recommendations for the regulatory approach that best ensures that the collection of solid waste in unincorporated areas of the county complies with the requirements of ORS 459A and Metro's RSWMP, and also balances the impacts on residents, haulers, and County operations.

This report includes the following sections:

- Statutory Requirements
- County Waste and Recycling System Overview including:
 - Customer Survey
 - Hauler Meeting and Survey
 - Service Providers and Collection Boundaries
 - Collection Services and Outreach Programs
 - Collection Rates

- Regulatory Scenarios
- Recommendations including:
 - Licensing System Characteristics
 - Current Service Levels
 - Metro Meeting on Licensing System
 - Licensing System Implementation Plan

Statutory Requirements

Oregon Revised Statute 459A and Metro Code Chapter 5.10 require Multnomah County to adopt a Regional Service Standard and Business Recycling Requirement in unincorporated areas of the County, consistent with the Metro Regional Solid Waste Management Plan (RSWMP). Unlike adjacent Washington and Clackamas Counties, and except for areas included in the urban service boundary of an adjoining city, solid waste collection in unincorporated Multnomah County is currently unregulated.

As a result, waste and recycling services in unincorporated Multnomah County are currently provided by local haulers to residential and commercial customers in an open market. The specific level of service is limited and the rate charged is determined between the hauler and the customer. The County seeks to ensure that the collection of solid waste in unincorporated areas of the county complies with applicable state and local regulations such as the RSWMP.

The residential service standard¹ established in the RSWMP has the following requirements:

1. Weekly curbside collection of designated recyclables²
2. Weekly curbside collection of glass for recycling
3. Curbside collection of used motor oil
4. Weekly curbside collection of yard debris (urban areas only)
5. Education and outreach provided to new customers and at least four times a year for existing customers

The business recycling requirement³ performance standard has the following attributes:

1. Businesses shall source separate all recyclable materials
2. Businesses shall ensure the provision of recycling containers for collection of materials
3. Business shall post signs identifying materials required to be recycled

Local governments are required to establish a method for ensuring compliance with the residential service standard and the business recycling requirements.

¹ Metro RSWMP Chapter 5.10.230 to include single family residences, duplexes, triplexes, and fourplexes.

² Paper products, plastic bottles and tubs, small scrap metal items, aluminum cans and foil, and tin cans.

³ Metro RSWMP Chapter 5.10.330.

County Waste and Recycling System Overview

The solid waste collection system refers to the commercially operated system of collecting waste and recyclables from residential and commercial customers. This includes recyclable materials, yard debris for composting, and trash destined for the landfill.

This section summarizes the results of surveys and research on the current solid waste collection system conducted in connection with this project:

- a customer survey regarding level of satisfaction with current services
- a hauler meeting and survey to determine current waste and recycling collection services
- a map and description of current haulers and service areas
- a description of collection services and outreach programs currently offered
- a discussion of current collection rates charged

Customer Survey

The County contracted with Opinion Works to complete a survey of 150 residential and 50 commercial customers in the unincorporated areas. The results of the survey reveal a high level of participation and customer satisfaction with the services currently provided. The following tables summarize the survey results on the service levels and overall level of customer satisfaction.

Table 1: Service Level Survey Results

Question	Residential	Business
Receive curbside trash collection	83%	82%
Receive curbside recycling collection	96%	84%
Receive curbside collection of glass	89%	79%
Receive curbside yard debris collection	52%	N/A

Table 2: Customer Satisfaction Survey Results

Level of Satisfaction	Residential (East)	Residential (West)	Total Residential	Business
Very Satisfied	85%	52%	69%	79%
Somewhat Satisfied	14%	20%	17%	14%

The complete results are included in the Appendix of this report.



Hauler Meeting and Survey

A meeting with representatives from the various collection companies was conducted January 30, 2013 to solicit input on the regulation process. Following the meeting, a survey was completed by the current service providers within the County to determine the specific collection areas, levels of service provided, and approximate customer counts. The hauler survey was cross-referenced with the customer survey completed by Opinion Works to validate the results. Follow up calls with each service provider were completed to confirm the submitted information.

There are eight documented collection companies providing waste and recycling collection services in the unincorporated areas of the County. During the meeting with the collection companies referenced above, it was learned that another company, Corbett Garbage Service, may also be providing residential waste collection in the eastern sections of unincorporated Multnomah County. The County has attempted to contact the owner of Corbett Garbage Service but to date, has not heard back so this report does not include any information about this company or their services.

The County is divided into the following five collection areas for the purposes of this project:

1. **East County** – This is the area east of the Metro Urban Growth Boundary (UGB) to the County lines.

Service providers: Crown Point Disposal and Rockwood Solid Waste (Mountain View Disposal⁴).

2. **East Urban** – These are the areas east of Troutdale and Gresham to the UGB. In addition, this also covers Blue Lake and a small area between Portland and Gresham along Foster Road south to Clackamas County.

Service providers: Twelve Mile Disposal, Rockwood Solid Waste, Kahut Waste, Waste Management, and Waste Connections.

3. **Portland** – Urban services areas are located along the City of Portland boundaries. There are four distinct areas: the Dunthorpe neighborhood along Highway 43, the Southwest Hills neighborhood area south of Highway 26, the Sylvan Highlands area just north of Highway 26 near the Oregon Zoo, and the Northwest Heights neighborhood on the west side of Skyline Boulevard.

Service providers: Republic Services, Lehl Disposal, Walker Garbage, and Waste Management.

4. **Northwest Hills** – This area is west of the City of Portland and extends north of Highway 26 along the boundary of Washington County. North of Portland, the area extends along Highway 30 to the boundary of Columbia County.

Service providers: Waste Management and Walker Garbage.

⁴ Rockwood Solid Waste purchased the collection routes of Mountain View Disposal in 2010.

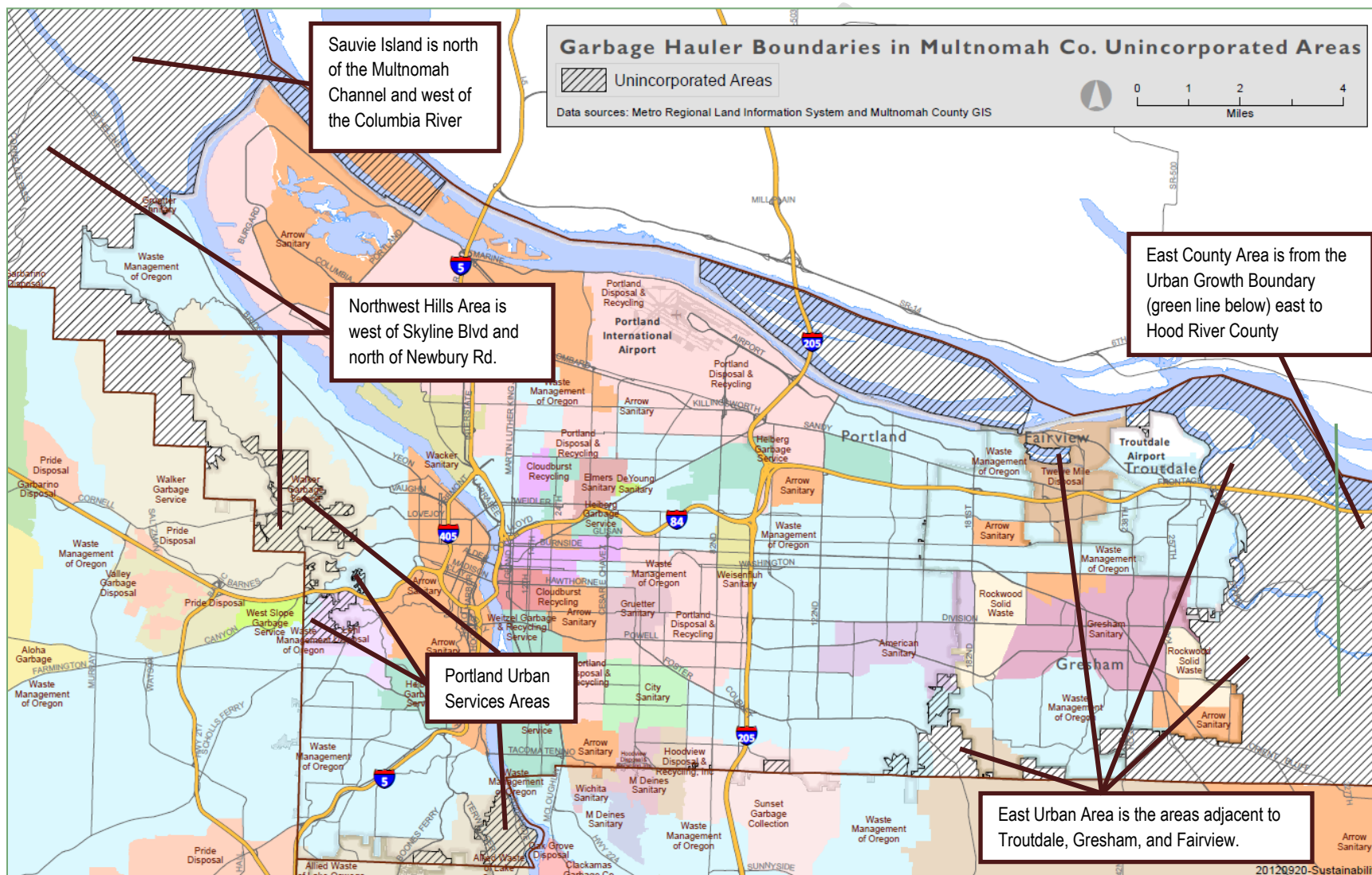


5. **Sauvie Island** – This is only the island area north of the Multnomah Channel to the Columbia River.

Service provider: Waste Management.

The map on the following page provides the location of the five primary service areas within the County.

Figure 1: Multnomah County Collection Area Map



Service Providers and Collection Boundaries

While the County has not established official collection boundaries, the current service providers have established boundaries either as a result of collection franchises granted by other incorporated jurisdictions, natural boundaries such as rivers, or historical service arrangements. The following table details the current collection areas by area and hauler.

Table 3: Service Areas and Providers

Area	Hauler	Boundaries
East County	Crown Point	East of Troutdale to Hood River County and south to the Sandy River
East County	Rockwood	East of Gresham to the Sandy River (north and east) to Clackamas County
East Urban	Twelve Mile Disposal	Residential area surrounding Blue Lake
East Urban	Waste Connections	Limited area south of Gresham along Highway 26
East Urban	Rockwood	Area south of Division Dr. to Lusted Rd.
East Urban	Waste Management	Limited areas just outside of Troutdale and Gresham
East Urban	Kahut Waste	Limited areas south of Gresham along Foster Rd. and SE Hogan Rd.
Portland	Republic Services	Dunthorpe neighborhood along Highway 43
Portland	Lehl Disposal	Southwest Hills neighborhood south of Highway 26
Portland	Walker Garbage	Forest Heights neighborhood west of Skyline Blvd.
Portland	Waste Management	Sylvan Highlands neighborhood north of Highway 26
NW Hills	Walker Garbage	Area between NW Thompson and NW Laidlaw
NW Hills	Walker Garbage	Area north of Laidlaw to Newberry / Skyline along Washington County boarder
NW Hills	Waste Management	Area stretching from north of Newberry / Skyline to along the border of Washington County to Columbia County
Sauvie Island	Waste Management	Island area north of Multnomah Channel to the Columbia River

Collection Services and Outreach Programs

Customers in East County and East Urban areas are receiving a level of waste and recycling collection service comparable to Gresham and Fairview. Customers in the NW Hills area have been receiving the same level of collection service as those mandated by Washington County for customer within the Metro Urban Growth Boundary. Customers within the Portland urban service areas are receiving the same level of collection services as the City of Portland.

The reason that the service levels in unincorporated areas are similar to the levels in the neighboring jurisdictions is that collection routes are established based on the level of required services. Since the County has not required specific levels of service, the haulers find it more efficient to provide comparable services on a given route that meet the standards of the

neighboring cities and counties with specified service standards, even if part of that route is in unincorporated Multnomah County and not subject to the same regulations.

Residential Trash Collection

All residential customers receive, at a minimum, weekly collection of trash destined for landfill, with the exception of residential customers in the Portland urban services district who receive every-other-week (EOW) trash collection.

Residential Recycling Collection

All residential customers receive recycling services for mixed papers, metals and plastics with a roll cart. Haulers on the east side of the County provide customers with a 65 gallon cart, and haulers on the west side provide either a 65 gallon or 95 gallon cart. All customers have used motor oil collection at the curb as well as curbside collection of separated glass. The only exception is Sauvie Island where glass is not collected on-route. A community glass depot is located at Sauvie Island Elementary School and is managed by Waste Management. The depot is open to all residents on the island.

Residential Yard Debris Collection

Collection of yard debris varies by area and by haulers. Twelve Mile customers near Blue Lake receive weekly service similar to Fairview customers. The remaining haulers serving customers around Gresham do not provide yard debris collection service. Eastside customers of Crown Point Disposal and Rockwood Solid Waste may subscribe and pay an additional amount for weekly yard debris service. (There are currently only ten subscribers for service.) All customers located in the urban service areas of Portland receive weekly yard debris / organic waste service. Walker Garbage provides EOW yard debris service to the customers between NW Thompson and NW Laidlaw Roads.

Commercial Collection Services

Collection frequency and container size vary according to the amount of trash and recycling each business generates. Collection frequency ranges from on-call service to six times a week. Each hauler surveyed confirmed that every business is provided the opportunity to recycle and that collection of the recyclable materials depends on the size of the container provided and the amount of material generated.

Education and Outreach

All haulers confirmed that all new customers are provided with brochure(s) and a collection schedule that details the trash and recycling services provided. Many of the haulers also provide additional details such as rates and recycling education materials on their company websites.

The table below summarizes the reported waste and recycling collection services and education and outreach programs by geographic area.

Table 4: Reported Collection and Outreach Programs by Area

Area	East County	East Urban	Portland	West Hills	Sauvie Island
Residential Customers	1,115	725	1,342	379	315
Garbage	Weekly	Weekly	EOW	Weekly	Weekly
Recycling	Weekly	Weekly	Weekly	EOW	EOW
Glass	Weekly	Weekly	Weekly	EOW	Depot
Motor Oil	Weekly	Weekly	Weekly	EOW	EOW
Yard Debris	Subscription	Sub / NO	Weekly	Sub / NO	NO
Rec Container	Cart & Bin	Cart & Bin	Cart & Bin	Cart & Bin	Cart Only
Education & Outreach	Yes	Yes	Yes	Yes	Yes
Commercial Customers	45	80	3		18
Recycling	Weekly & EOW	Weekly & EOW	Weekly & EOW		Weekly & EOW
Education & Outreach	Yes	Yes	Yes		Yes

Table Notes: EOW = Every-Other-Week; Sub = Subscription Service; NO = Not Offered.

Collection Rates

The hauler surveys did not ask for collection rates charged to customers in unincorporated Multnomah County because of the current open, competitive market. However, some of the haulers disclosed the rates charged were the same rates as the neighboring jurisdictions. The following table lists the rates established by neighboring jurisdictions for residential trash and recycling collection.

Table 5: Residential Collection Rates for Neighboring Jurisdictions

Jurisdiction	Clackamas Rural	Washington Urban	Columbia County	Sauvie Island (Weekly Trash)	Sauvie Island (EOW Trash)
35 gal trash	\$25.30	\$21.88	\$26.19	\$27.50	\$17.90
64 gal trash	\$36.40	\$31.75	\$35.90	\$31.15	\$21.85
96 gal trash	\$41.70	\$37.54	Not offered	\$34.85	\$22.65
Recycling	Weekly	96 gal EOW	64 gal EOW	64 gal EOW	64 gal EOW
Glass	Weekly	EOW	Not offered	Not offered	Not offered

Table Notes: EOW = Every-Other-Week.

Regulatory Scenarios

Four regulatory systems were developed and reviewed by the consultant and County staff. Please see the Appendix for the initial evaluation of potential scenarios developed by County staff.

The primary input from County leadership was to utilize the “lightest touch” necessary to conform to ORS 459A as well as the Metro RSWMP. County staff applied a light touch approach when considering the regulatory impact on rates paid by customers, the administrative impact on the County, and the impact on the haulers. The four systems are summarized below, as well as the advantages and disadvantages of each:

1. Service Boundary Extension - Work with neighboring jurisdictions to extend solid waste urban service area boundaries to cover unincorporated areas within the Metro Boundary.

Boundary Extension Advantages

- Would ensure all areas of unincorporated County within the Metro Boundary have levels of service consistent with the neighboring jurisdiction.
- Eliminates the need for Multnomah County to develop any new regulatory or outreach infrastructure.
- Could be combined with licensing, contracting, or franchise system to provide regulatory coverage throughout unincorporated areas.

Boundary Extension Disadvantages

- Relies on each neighboring jurisdiction to initiate changes and removes control from the County. May be politically difficult and requires city council actions to expand service areas.
- Fully complies with ORS 459A but not with Metro's RSWMP⁵.
- Separates more densely populated areas within Metro Boundary from rural areas, making future regulation of rural areas potentially more difficult.
- Cities would need to set service standards and collection rates in rural areas which may be different than those applicable to more urban areas.

2. Franchise - The County establishes geographic zones and assigns a hauler to provide exclusive service within that zone.

Franchise Advantages

- Ensures that all customers within the franchise zones are able to get collection services if desired.

⁵ Washington County's every-other-week curbside recycling program is not in compliance with Metro's RSWMP requirement for weekly collection.

- Increases control over rates and service levels.
- Well established revenue model for reimbursing the County's administrative costs and hauler capital and operating costs.
- Franchise zones could follow existing service areas for haulers already providing service.

Franchise Disadvantages

- Limits customer choice of service provider.
- Would require County Code revisions and administrative rules.
- Administratively intensive for the County - requires review of hauler's accounting information for the calculation of collection rates and fees.
- Sets up monopolies that must be closely regulated.

3. Contracting - The County, through a Request for Proposal (RFP) process, awards a limited number of contracts to a hauler(s) for the provision of waste collection services in a defined geographic area.

Contracting Advantages

- An RFP process would allow the County to choose the hauler(s) that provides the best services at the lowest rate to customers.
- Rates could be set to increase with the Consumer Price Index (CPI) over life of contract, reducing the need for ongoing rate setting.
- Clear demarcation of responsibilities in the contract.
- Avoids duplication of services by multiple haulers and allows selected hauler to realize greater economy of scale.
- Ensures all customers are able to get designated services if desired.

Contracting Disadvantages

- The RFP process and contract administration are time-consuming and expensive.
- Proposers may be reluctant to bid for a contract with no firm pricing or customer guarantee.
- Limits customer choice to contracted service provider.
- Locks the County into a long-term contract (contract length would usually be seven years to accommodate amortization schedule).

- May disadvantage smaller local haulers who have traditionally provided service in rural areas of the County.
- Complicated administration for fragmented sections of unincorporated County.

4. Licensing - A largely open market system that allows any hauler to provide service in unincorporated Multnomah County as long as they meet the conditions of the license.

Licensing Advantages

- Relatively easy to implement.
- Would ensure that haulers comply with applicable State and local laws as a condition of the license.
- Would not cause a disruption in current services and allows current haulers to continue doing business in areas where they have operated.
- Maintains current system where rates are agreed to between service provider and customer and limits the County's role in the administratively intensive process of regulating rates.
- Allows County to update license requirements to accommodate unexpected challenges or regulatory compliance as often as licenses need to be renewed.

Licensing Disadvantages

- License fees alone may not cover all of the County administrative costs.
- Requires County Code revisions and/or administrative rules, although not to the extent that a franchising system that eliminates competition would require.
- Education and outreach materials may not be consistent.
- Potential rate imbalance between all customers with comparable services.
- Without defined service areas it is difficult to mandate that any customer who wants curbside collection service is able to get that service.

Recommendations

Of the four scenarios considered by the County, licensing the current service providers in the County's open market system best meets the objective of ensuring that the collection of solid waste in unincorporated areas of the county complies with the requirements of ORS 459A and Metro's RSWMP while also balancing the impacts on residents, haulers, and County operations, for the following reasons:

- Licensing would provide the County the capacity to implement the regulatory framework as directed without the need for a significant level of staff effort. Keeping the administrative costs low for the County is a priority because the small, disparate customer base may not support the added burden of a high license fee that the haulers will pass through in the form of a rate increase.
- Licensing would have the least potential impact on rates for customers.
- Most Metro area jurisdictions assess a 5% franchise fee on the collection rate. Collection rates for weekly 32 gallon waste collection range from \$20 to \$25 per month, so the addition of a license fee would add \$1.00 to \$1.25 to the rate. Excluding the customers in the urban service areas, there are approximately 2,500 customers in the remaining unincorporated areas of the County. Assuming the County assesses \$1.00 per customer per month, the annual license fee revenue is approximately \$30,000 a year. This is equivalent to 0.25 FTE (Full-Time Equivalent) which is in the mid-range level of effort estimated for developing and administering a licensing system (see Table 6).
- The current providers of collection service are providing the minimum levels of service as the neighboring jurisdictions and have a high level of customer satisfaction. This was accomplished without any oversight by Multnomah County or Metro.
- Licensing alleviates the obligation of the County to set collection rates by maintaining the open market system that provides the haulers the ability to compete for customers and establish collection rates. During the discussion with the haulers, many charge their Multnomah County customers the same rate as the neighboring jurisdiction.

A licensing system would also have some drawbacks.

- The RSWMP has a once a week curbside collection requirement for recyclables, including glass; a standard not currently met in the NW Hills and Sauvie Island. The service level increases in these areas would increase costs for the haulers and most likely result in increased rates for customers above any increase in rates due to County fees.⁶
- An open market licensing system, unlike a defined service area arrangement (e.g. franchise), would not provide a guarantee of service to all customers.⁷

⁶ This challenge is not specific to a licensing system; increased service levels will most likely result in increased cost for customers no matter what regulatory policy is chosen.

⁷ This is unlikely to be an issue since haulers have a financial incentive to provide service, although some customers may be located in isolated rural areas with poor access where service is too difficult to provide on a cost competitive basis.

To monitor these potential drawbacks and ascertain if further action is needed the County could require that haulers provide data on the rates they are charging customers and any refusal of service.

Licensing System Characteristics and Fiscal Impacts

All haulers with routes and customers in unincorporated Multnomah County would be required to have a license. Licenses would be limited to the current service providers in order to ensure that these providers are able to continue their business as long as they meet the licensing requirements. In less dense and rural areas, it is more difficult to maintain efficient routing and adequate profit margins. Any future licensees would be required to demonstrate to the County a need for an additional service provider because the specific area is either under-served or no collection services are provided.

The terms of the license would require the haulers to maintain the minimum collection and outreach requirements for waste and recycling, meet transportation safety standards, and comply with federal, state and local regulations. Sample license provisions based on the City of Portland and the City of Eugene rules and regulations were compiled for this Project and can be used as guidance for developing the administrative tools for Multnomah County.

Although the licensing system would be lighter on administration, relative to other regulatory approaches, there would still be an administrative cost to the County. Haulers would be charged a license fee to cover some or all of the cost of the County's administration. Enforcement would be complaint-driven and there would be no review or regulation of rates charged to customers. An estimated level of effort for the County to develop and administer a licensing system is included in Table 6.

Outreach to waste generators and coordination with Metro and other regional governments also increase the administrative responsibilities of the County. If determined to be in compliance with the RSWMP with the implementation of a licensing system, the County would be eligible for funds from Metro for waste reduction and recycling program maintenance, education and outreach services. Funds are allocated on a per-capita basis for meeting residential service standards and on a per employee basis for meeting the business recycling requirements. Funds would be in the range of approximately \$11,000 annually for unincorporated Multnomah County. Funding requirements include approval of an intergovernmental agreement between Metro and the County each year, submitting an annual waste reduction work plan to Metro that details outreach or other recycling program support activities that would be pursued in the upcoming fiscal year, and an annual progress report on the previous fiscal year's accomplishments. Metro also hosts a variety of regional working groups and solid waste meetings that County representatives may need, or want to attend.

For haulers, margins for collection operations in the rural areas of the County return smaller margins due to the lower productivity. Collection productivity is measured by the number of carts and containers collected per route hour. Curbside collection is every-other-week in some of the rural areas. This recycling program is the same as Washington County's current program. Expanding this service to weekly **may** increase the amount of material collected; however, rates

will increase and customers may choose to stop service. When a few customers choose to stop service, the cost of the route is allocated over a smaller customer base; therefore, costs increase on a per customer basis. As noted earlier, 86% of the surveyed customers are satisfied with their current level of service.

Current Service Levels

All customers in the East County, East Urban, and Portland Urban Service areas are receiving the Metro approved level of service. No changes are required to the collection program for these customers. Customers in the West Hills and Sauvie Island are the exception. Although Metro is considering the elimination of the less than weekly collection exemption for recycling, all West Hills customers are receiving the same level of service as Washington County customers. Washington County's level of service was approved by Metro. For the approximately 380 customers in the West Hills, it would be very expensive to establish a separate route to collect recycling on a weekly basis. The recommended approach would be to maintain the current levels of service and change if or when Washington County implements weekly collection of recycling.

Customers on Sauvie Island and in the northwest corners of the County are not provided collection of glass at the curbside for recycling. Because these customers are outside the Metro boundary, this has never been perceived as an issue because the glass depot on Sauvie Island and another glass depot at the Columbia County Transfer Station meet customers' needs. If the County decides to require curbside collection of glass for these residents, the County will need to consider how the frequency of collection and the associated costs affect customer rates.

Recycling is currently collected every-other-week. If it is necessary to run a separate truck for weekly glass collection during the off weeks, this will likely result in increased costs that are passed on to customers.

If the glass is to be collected with the recycling every-other-week, there are three options for collection:

- 1) Run a separate truck for glass,
- 2) Add a detached compartment or box for glass on the recycle truck, or
- 3) Mix the glass in the cart with the other mixed recyclable materials.

While the first two options are currently utilized in the metropolitan area, the third option is available if the amount of glass is expected to be less than five percent of total weight. All the material recovery facilities in the Portland region are designed to handle a small amount of glass in the mixed recycling stream. While mixing the glass is not the preferred method, it does satisfy the curbside requirement. Coupled with the glass recycling depot on the island, the amount of glass could be very low and the cost of the third option may be zero.

Metro Meeting on Licensing System

A meeting was held with Metro and County staff regarding the proposed licensing system on February 26, 2013. Below are responses to questions raised at the meeting.

Question: Will haulers be required to provide service to all customers who request it?

Answer: No. The system would remain relatively as is. The licensing system allows the County to have some level of control and knowledge of the system in order to respond to citizen complaints/questions. It would authorize the hauler to provide service, and if provided, with what minimum service levels as set by the County. It is still an open market system where customers and service providers must mutually agree on services and rates. A hauler can choose to provide service or not. A customer can choose to self-haul or call another licensed hauler.

Question: Should the licensing agreement give the County the authority to audit haulers if necessary, with the understanding that regular reporting will not be a required condition of the license?

Answer: There are no compelling reasons to audit a hauler at this time. Perhaps give the County authority to inspect the premises and relevant records, not "audit". This provision is already in the sample license language provided.

Question: How will multi-family residences be served (i.e., will they effectively be served like businesses for collection but like single-family residences for education and outreach?)

Answer: Duplexes, triplexes, and fourplexes will be treated as residential and the rest are treated as commercial.

Question: What kinds of customer protections can be built into the license to prevent rate imbalances?

Answer: It will remain an open market system. If the customer is not satisfied with the rates, they can negotiate, self-haul or call another licensed hauler.

Licensing System Implementation Plan

The following table describes key tasks and estimated level of effort for developing and maintaining a licensing system for the regulation of solid waste collection in unincorporated Multnomah County. Suggested action steps and responsible parties are noted.

This Implementation Plan is intended to provide a starting point for planning purposes. Tasks and level of effort may vary depending upon the action the County takes to design and approve the details of the licensing system.

At this point in the analysis, 0.29 FTE is estimated to be needed for developing and implementing the licensing system in the first year. In subsequent years, it is estimated that 0.22 FTE will be needed for ongoing annual administration of the licensing system.

Table 6: Implementation Plan for Proposed Multnomah County Solid Waste Regulatory System

Task Deliverable	Action Steps/Task Description	Responsible Party	Level of Effort Estimate (labor hours)
<i>First Year Development and Implementation</i>			
County Code	<ul style="list-style-type: none"> Revise County Code to include authority and general provisions for licensing haulers to collect solid waste, recyclables and organics. Use City of Portland and/or City of Eugene Codes as guidance. 	1. Legal 2. Staff 3. Final Approval by Board of Commissioners	1. 60 hours 2. 20 hours 3. NA
Administrative Procedures	<ul style="list-style-type: none"> Prepare administrative procedures for any additional details for the rules and process for issuing and monitoring hauling licenses. Use City of Portland Administrative Rules and/or City of Eugene Administrative Order as guidance. 	1. Legal 2. Staff 3. Final Approval by Board of Commissioners	1. 80 hours 2. 40 hours 3. NA
License Application	<ul style="list-style-type: none"> Prepare draft and final license application. Include requests for applicant information on company, insurance, and vehicles, for example. See sample application from City of Portland, for example. 	1. Legal 2. Staff	1. 4 hours 2. 20 hours
License Agreement	<ul style="list-style-type: none"> Prepare draft agreement to include in license application package. See sample license agreement crafted from key provisions of City of Portland. Suggest term of agreement between 3-5 years with annual renewals based on compliance with conditions of license and payment of annual license fee. 	1. Legal 2. Staff	1. 40 hours 2. 10 hours
Issue License Application Package, Review Applications and Execute License Agreements.	<ul style="list-style-type: none"> Prepare package including application and sample license agreement. Issue to all current haulers operating in unincorporated Multnomah County. Review applications based on pre-determined criteria. Issue notice of intent to enter into license agreement to qualified haulers. Execute license agreements. 	1. Legal 2. Staff	1. 40 hours 2. 40 hours
Public Involvement	<ul style="list-style-type: none"> Prepare any press releases, conduct any neighborhood or community meetings and/or other media or public involvement needed to explain the regulatory system change to licensing prior to Board of Commissioners public hearing on decision to implement licensing system. 	1. Staff	1. 40 hours

Task Deliverable	Action Steps/Task Description	Responsible Party	Level of Effort Estimate (labor hours)
Administrative Tools	<ul style="list-style-type: none"> Assign staff responsible for administration of licenses. Prepare any needed forms or accounting tools to record and/or document required County administrative responsibilities including annual reporting, annual license renewals, budgeting, and collection of license fees, for example. 	1. Staff	1. 40 hours
Outreach and Education	<ul style="list-style-type: none"> Assign staff responsible for outreach and education. Prepare outreach and education materials as necessary specific to Multnomah County. Use and/or customize existing materials from Metro, City of Portland and other neighboring jurisdictions adjacent to County service areas. Distribute to customers directly (in coordination with haulers) and/or to haulers for distribution to customers. 	1. Staff	1. 80 hours
Enforcement	<ul style="list-style-type: none"> Assign staff responsible for enforcement. Prepare any needed forms or tools to record and document the complaint and enforcement process including receipt, investigation and resolution of complaints. 	1. Staff	1. 80 hours
SUBTOTAL HOURS/ESTIMATED FTE			594 hours/.29 FTE
Ongoing Annual Administration			
Annual License Renewal	<ul style="list-style-type: none"> Prepare notice of intent to renew for each hauler with form to verify and/or note any changes in ownership, equipment, insurance, etc. Prepare form for remittance of annual license fee. Review administrative rules and make adjustments and changes as needed. Prepare license agreement amendment form for renewal. Issue notice and remittance form to all licensed haulers. Prepare and issue license renewal agreement amendment; could be a simple one-page letter noting the agreement, the date extension and space for County and hauler signatures. 	1. Legal 2. Staff	1. 60 hours 2. 40 hours
Annual Budget and Accounting	<ul style="list-style-type: none"> Prepare expenditure and revenue projection estimates for annual budget preparation. Receive and process annual license fees. Complete required accounting of expenditures and revenues throughout the year. 	1. Staff	1. 80 hours

Task Deliverable	Action Steps/Task Description	Responsible Party	Level of Effort Estimate (labor hours)
Annual Reporting	<ul style="list-style-type: none"> Receive, review and follow-up on any questions/discrepancies. Prepare compilations and submit reported data as needed. 	1. Staff	1. 20 hours
Outreach and Education	<ul style="list-style-type: none"> Review, update and distribute outreach and education materials as needed. Participate in one annual media or community event. Review and update web content pertinent to single and multi-family residential customers; businesses; and haulers. Respond to requests for materials and information from businesses that are regulated by the Business Recycling Requirement. Review and approve outreach materials provided by haulers to customers to ensure compliance with requirements of ORS 459A and ensure consistency of information. 	1. Staff	1. 160 hours
Enforcement	<ul style="list-style-type: none"> Receive, respond, investigate, resolve and document any complaints received in connection with licensing agreements and County regulatory system. Receive, respond, investigate, resolve and document any complaints received in connection with the Business Recycling Requirement. 	1. Staff	1. 100 hours
SUBTOTAL HOURS/ESTIMATED FTE			460 hours/.22 FTE

Unincorporated Multnomah County Solid Waste Regulation Program Scenarios				
<div>Increasing Administrative Burden to the County</div>				
Program Type	Service Boundary Extension: Work with neighboring jurisdictions to extend solid waste urban service area boundaries to cover unincorporated areas within the Metro Boundary	Licensing: A largely open market system that allows any hauler to provide service in unincorporated Multnomah County as long as they meet the conditions of the license	Contracting: The county, through an RFP process, awards a limited number of contracts to a hauler(s) for the provision of waste collection services in a defined geographic area	Franchise: The county establishes geographic zones and assigns a hauler to provide exclusive service within that zone
Pro	<ul style="list-style-type: none">• Would ensure all areas of unincorporated MultCo, within the Metro Boundary, have level of service consistent with neighboring jurisdiction• Obviates the need for Multnomah County to develop any new regulatory or outreach infrastructure• Could be combined with licensing, contracting, or franchise system to provide regulatory coverage throughout unincorporated areas	<ul style="list-style-type: none">• Relatively easy to implement• As a condition of license ensures that haulers comply with applicable State and local laws• Will not cause a disruption in service and allows current haulers to continue doing business in areas where they have operated• Allows for greater consumer choice.• Allows County to updating license requirements to accommodate unexpected challenges or regulatory compliance as often as licenses need to be renewed	<ul style="list-style-type: none">• Competition during RFP would allow MultCo to choose hauler that provides the lowest rate to customers• Rates could be set to increase with CPI over life of contract, obviating the need for ongoing rate setting• Clear demarcation of responsibilities in the contract• Avoids duplication of services by multiple haulers and allows selected hauler to realize greater economy of scale• Ensures all customers are able to get curbside service if desired	<ul style="list-style-type: none">• Ensures that all customers within the franchise zones are able to get curbside service if they want it• Increased control over rates and service levels• Well established revenue model for reimbursing MultCo administrative costs• Franchise zones could follow existing service areas for haulers already providing service, thus not disadvantaging smaller providers
Con	<ul style="list-style-type: none">• Uncertain outcome - relies on the local jurisdiction to initiate (i.e. MultCo does not control process or outcomes) – may be politically difficult and requires city council action to expand service areas• Fully complies with ORS 459A (but not Metro RSWMP) - to fully comply with RSWMP all areas of the county must meet RSS• Separates more densely populated areas within metro boundary (that are more lucrative for haulers) from rural areas, making future regulation of rural areas potentially more difficult	<ul style="list-style-type: none">• The County does not set rates, so rates may be higher for customers than they otherwise would be in neighboring jurisdictions• Does not guarantee that anyone who wants curbside trash/recycling collection is able to get curbside collection• License fees alone would likely not cover all of the MultCo administrative costs (may require addition of tip-weight-fee or some analogous revenue model)	<ul style="list-style-type: none">• Limits customer choice• Locks the County into a rigid contract (Contract length would usually be seven years to accommodate amortization schedule)• May disadvantage smaller local haulers who have traditionally provided service in rural areas of the County, especially Corbett• Complicated administration for fragmented sections of unincorporated MultCo (e.g. areas along Gresham Portland border and West hills)	<ul style="list-style-type: none">• Limits customer choice• May require statute or administrative rule changes to deal with unexpected challenges• Administratively intensive for MultCo, requires rate setting, which in turns requires review of accounting information from haulers• Sets up monopolies that must be closely regulated
Compliance	Partial Compliance with RSWMP	In Full Compliance with RSWMP		

S3. Do you live in a single-family home or in a building with more than one housing unit? *(If more than one):* Does your building have four or fewer housing units, or more than four?

	<u>Residential</u>			<u>Business</u>
	East	West	Total	
Single-family			100%	
2 to 4 units'			*%	
More than 4 units <i>(Thank and terminate.)</i>				
9 Not sure/Refused <i>(Thank and terminate.)</i>				

Trash Disposal

(All):

1. Do you currently have trash pickup service at your {home/business}?

Yes <i>(Continue with Q.2.)</i>	84%	82%	83%	82%
No <i>(Skip to Q.4.)</i>	16%	18%	17%	18%

(If yes):

2. How often? *(Read list.)*

When I call	*%	*%	*%	7%
Once a month.....	17%	5%	11%	5%
Every other week	5%	43%	23%	10%
Weekly	77%	52%	65%	73%
<i>(Do not read):</i>				
More often than weekly	3%	*%	1%	5%
Other <i>(Specify.)</i>	*%	*%	*%	*%
Not sure	*%	*%	*%	*%

3. What company hauls your trash? *(Do not read list.)*

Waste Management (of Oregon)	6%	25%	15%	27%
Crownpoint Refuse and Recycling.....	26%	*%	14%	20%
Walker Garbage Service	*%	25%	12%	2%
Lehl Disposal.....	*%	25%	12%	*%
Mountain View Sanitary.....	12%	*%	6%	22%
Hoodview Recycling and Disposal.....	9%	*%	5%	2%
Twelve Mile Disposal.....	9%	*%	5%	*%
Allied Waste (of Lake Oswego)	*%	8%	4%	*%
Waste Connections/Arrow Sanitary	*%	*%	*%	5%
Portland Disposal and Recycling.....	*%	*%	*%	2%
Rockwood Solid Waste	*%	*%	*%	2%
Other <i>(Specify.)</i>	12%	3%	8%	2%
Not sure/Refused to say	25%	13%	19%	15%

(If Q.1=no, ask Q.4 & 5; if Q.1=yes, skip to Q.6):

4. How do you dispose of trash from your {home/business}? (Open-ended; do not read list. Clarify as necessary. Accept multiple responses if offered, but do not probe.)

	-----Residential-----			Business
	East	West	Total	
(Do not read):				
Self-haul.....	83%	86%	85%	90%
Share with neighbor (residential only)	8%	7%	8%	*%
Burn it	*%	14%	8%	10%
Property manager/Landlord handles	8%	*%	4%	*%
Take to work (residential only)	*%	*%	*%	*%
Take home (business only)	*%	*%	*%	*%
I recycle/compost everything	8%	14%	12%	*%
Other (Specify.)	*%	7%	4%	*%
Not sure	*%	*%	*%	*%

(Business audience skip to Q.6.)

5. Do you ever burn garbage at your home?

Yes.....	50%	54%	52%
No	50%	46%	48%
Not sure/Refused	*%	*%	*%

(Residents without a hauler skip to Q.15.)

Recycling Service

6. (If Q.1=yes): Does your garbage company pick up...

(If business audience and Q.1=no): Do you have a company that picks up...

...recycling such as paper, metal, and plastic? (Code yes even if recycling hauler not the same as trash hauler.)

Yes.....	97%	95%	96%	84%
No	3%	3%	3%	16%
Not sure	*%	2%	1%	*%

(If no or not sure: Skip to Q.11 if Q.1=yes; skip to Q15 if Q.1=no.)

(If Q.6=yes):

7. How often? (Read list.)

When I call	*%	*%	*%	14%
Once a month.....	11%	2%	7%	*%
Every other week	5%	32%	18%	14%
Weekly	75%	58%	67%	64%
(Do not read):				
More often than weekly	3%	*%	2%	2%
Self haul	3%	2%	2%	*%
Not sure	3%	7%	5%	5%

(If Q.6=yes):

8. Does the company pick up glass?

	<u>Residential</u>			<u>Business</u>
	East	West	Total	
Yes.....	94%	84%	89%	79%
No	3%	14%	8%	17%
Not sure	3%	2%	2%	5%

(Businesses with a hauler skip to Q.11.)

(Residential audience if Q.6=yes):

9. Does the company pick up motor oil?

Yes.....	57%	30%	44%
No	11%	18%	14%
Not sure	32%	53%	42%

(Residential audience if Q.6=yes):

10. Does the company pick up yard debris?

Yes.....	30%	75%	52%
No	30%	14%	22%
Not sure	40%	10%	26%

Hauler Issues

(All with a hauler; i.e., Q.1=yes or Q.6=yes)

11. Why did you pick your garbage company? (Do not read list. Clarify as necessary. Accept multiple responses if offered, but do not probe.)

Only hauler in area.....	83%	83%	83%	56%
Property manager/Someone else chose them.....	5%	10%	7%	21%
Recommended by a colleague/neighbor	9%	*%	5%	2%
Cost	6%	2%	4%	2%
To support local business.....	6%	2%	4%	2%
Schedule	*%	*%	*%	*%
Always had it.....	2%	5%	3%	7%
Not sure/Can't remember	2%	5%	3%	16%

12. How satisfied are you with your garbage company's overall service? (Read scale.)

Very satisfied.....	85%	52%	69%	79%
Somewhat satisfied	14%	20%	17%	14%
Neutral	*%	15%	7%	2%
Somewhat dissatisfied (If residential, ask Q.13.)	*%	7%	3%	2%
Very dissatisfied (If residential, ask Q.13.)	*%	2%	1%	*%
(Do not read):				
Not sure/Refused	2%	5%	3%	2%

(Business audiences with a recycling hauler skip to Q.18, Classification; businesses without a recycling hauler skip to Q.15.)

(Residents with a hauler if Q12=somewhat dissatisfied or very dissatisfied):

13. How would you change it? (Do not read list. Do not read list. Clarify as necessary. Accept multiple responses if offered, but do not probe)

	Residential		Business
	East	West	Total
More frequent service.....	*%.....	60%.....	60%
Less frequent service	*%.....	20%.....	20%
Lower cost.....	*%.....	*%.....	*%
Mentions something else (Specify.) *	*%.....	40%.....	40%
Not sure/Nothing	*%.....	20%.....	20%

*See verbatim responses at end of questionnaire.

(All residents with a hauler):

14. How much do you pay each month for your trash and/or recycling services? (Enter number 0-998; 999=Not sure/Refused)

\$0 – 19	18%.....	7%.....	13%
\$20 – 29	20%.....	5%.....	13%
\$30 – 39	17%.....	22%.....	19%
\$40 – 59	17%.....	13%.....	15%
\$60+.....	5%.....	23%.....	14%
Not sure/Refused	23%.....	30%.....	26%
Median	\$29.50	\$43.50.....	\$33.00

(Residents with a recycling hauler skip to Q.20, Classification.)

No Recycling Hauler

(All without a recycling hauler):

15. How do you dispose of recyclable materials from your {home/business}? (Open-ended; do not read list. Clarify as necessary. Accept multiple responses if offered, but do not probe.)

(Do not read):

Self-haul.....	92%.....	85%.....	88%.....	67%
Share with neighbor (residential only)	8%.....	7%.....	8%.....	*%
Throw all/most away.....	*%.....	8%.....	4%.....	*%
Take to work (residential only)	*%.....	*%.....	*%.....	*%
Take home (business only)	*%.....	*%.....	*%.....	*%
Property manager/Landlord handles	*%.....	*%.....	*%.....	22%
Bury them.....	8%.....	*%.....	4%.....	*%
Not sure	*%.....	15%.....	8%.....	22%

16. Do you throw away all or some of your recycling?

Throw all away	25%.....	8%.....	16%.....	11%
Throw some away	8%.....	23%.....	16%.....	56%
Recycle it/Throw away none of it.....	67%.....	69%.....	68%.....	33%
Not sure/Refused	*%.....	*%.....	*%.....	*%

(Businesses without a recycling hauler skip to Q.18.)

(Residents without a hauler):

17. If trash/recycling service were available and affordable in your area, would you consider getting that service?

	<u>Residential</u>		<u>Business</u>
	<i>East</i>	<i>West</i>	Total
Yes.....	25%	31%	28%
No	75%	54%	64%
Not sure/Refused	*%	15%	8%

(Residents without a recycling hauler skip to Q.20.)

Classification

(Business audience):

18. Do you have recycling collection points in your workplace for your employees?

Yes.....	82%
No	18%
Not sure/Refused	*%

19. Is your business in a multi-tenant building or in a stand-alone location?

Multi-tenant	12%
Stand-alone	88%
Not sure/Refused	*%

(Residential audience):

20. Do you own or rent your home?

Own	99%	96%	97%
Rent	*%	3%	1%
Not sure/Refused	1%	1%	1%

(All, by observation):

21. Gender

Male	40%	40%	40%	40%
Female	60%	60%	60%	60%

That's all the questions I have. Thank you for your time. Good bye.

Q.13 Other: How would you change (your garbage company's service)?
I WANT A DIFFERENT COMPANY TO DO IT BUT FOR SOME REASON THEY WONT DO IT. BUT THEY DRIVE RIGHT PAST MY HOUSE, TO MY BROTHERS HOUSE WHO HAS A HANDICAP PERMIT.
PEOPLE RECYCLE THEIR FOOD SCRAPS AND THEY TAKE THE FOOD SCRAPS OUT TO WASHINGTON COUNTY. WE DO NOT DO THAT. WE RECYCLE OUR LAWN DEBRIS AND THATS IT.*
THEY DON'T NEED TO PICK UP YARD DEBRIS EVERY WEEK.*
<i>*These two respondents also mentioned "more frequent service."</i>

Q7 * Q3 Crosstabulation: Residential

[illegible]

Q12 * Q3 Crosstabulation: Residential

[illegible]

Q7 * Q3 Crosstabulation: Business

[illegible]

Q12 * Q3 Crosstabulation: Business

[illegible]