



TO: Senate Energy & Environment Committee
FROM: City of Medford
Cindy Robert 503-260-3431
RE: Opposition to SB 245 & SB 263
DATE: February 26, 2015

While the City of Medford continues to support waste reduction and increased recycling efforts through programs currently in place, we have outstanding concerns about the changes proposed in SB 263 and SB 245. The analysis of these bills and commentary comes from Rogue Disposal & Recycling, which has been serving the people of Southern Oregon since 1938.

Certainly, the DEQ's Solid Waste program engages in valuable work, yet we have a difficult time accepting the request for a 50% increase in solid waste derived fees to restore and enhance activities that have been cut during the economic downturn. Municipalities have had to make cuts, as well, as the economy struggles to recover - but until the recovery is robust enough to fill the coffers again, we are all faced with continuing to look for efficiencies. The City of Medford is also concerned that DEQ has been unable to clearly illustrate the added value to our citizens (ratepayers) that such an increase will bring about. Most importantly, if Oregon is successful in continuing to decrease the garbage going to landfills, and that is the only source of funding for DEQ's "Materials Management" programs, are we going to see perpetually escalating tip fee costs? Isn't this an unsustainable approach?

DEQ claims they will use the additional fees to restore positions and programs that have been in stasis or decline since before the recession began, and many of these positions will be working on recycling recovery related work, and waste prevention work. Based on the recently released DEQ 2013 Oregon Material Recovery and Waste Generation Rates Report, Oregon broke records in 2013 in terms of material recovered (53.9%), and per capita waste disposed - which is at a 22 year low. Oregon has been increasing the recovery rate and decreasing the per capita waste disposed of without the benefit of all of these new programs and positions - so we must question what we are getting for our increased fees.

Some of the changes being proposed in SB 263, namely elimination of the 2% credits, may jeopardize the future of the Jackson Co Recycling Partnership. If small communities no longer have an incentive to participate in achieving the waste shed goals, they will drop out and the remaining communities will have to decide how to

maintain programs associated with the credit program. We are not sure anyone can yet determine what the cost of compliance will be for Medford, Central Point and Ashland, because the details of the Waste Prevention and Reuse requirements will have to be worked out in rule making.

The City is concerned that, in addition to the fee increase proposed in SB 245, there will be additional costs in the next few years to comply with new statewide goals to increase recovery of carpet, plastics and food waste, and multi-family recycling programs, for example. While we are assured that these proposed goals are aspirational at this point, it would be prudent to assume that compliance with these goals, like the currently voluntary 2% Waste Prevention and Reuse credit program, will be mandatory at some point. The cost to administer and enforce these programs will be passed along to the ratepayer/tax payer/consumer, and need to be quantified and acknowledged.

The City would like to see a provision of alternative means of complying with the objectives of the 2050 Vision, and consideration and acknowledgment of programs our local solid waste service providers are voluntarily engaging in, like conversion of collection fleets to CNG fueled vehicles, and generation of power from biogas at Dry Creek Landfill. Given air quality issues in the Rogue Valley, and distance to recycling markets, there is valid justification for considering giving weight to these kinds of programs, and allowing them to qualify as alternative means of achieving the goals of the 2050 Vision. There needs to be more flexibility in how goals are set and met, and allowances made for unique regional circumstances - not a cookie-cutter, Metro-centric approach.