February 7, 2023

St. Paul City Council
15 Kellogg Blvd. West 310 City Hall
Saint Paul, MN 55102

Dear Councilmembers,

These Garbage Advisory Committee's and Public Works' Coordinated-Collection recommendations offer significant savings to residents: cart sharing and opting out; issuing a Request for Proposals; and city assumption of billing. Please consider the following suggestions when approving the program changes.

Cart Sharing and Opting Out should be easy

Cart sharing and opting out promote waste reduction and reduce garbage-truck idling with fewer stops. Public Works' proposed application process, fees and monitoring will discourage participation. Assuming that anyone opting out or cart sharing could engage in illegal disposal is unfounded and ignores other sources of illegal dumping. Overflowing carts should be handled on a complaint basis and not through monitoring.

These administrative components are unnecessary and inequitable:

Component [1]	**Comment**
"The City shall have sole discretion in approving or denying [a cart sharing] application."	What objective standard will be used and what appeals process is available?
"The number and size of carts shall be appropriate to the waste generated in the sharing properties."	This requirement should apply to all properties, not just those sharing carts.

[1] Public Works Recommendations for Garbage and Recycling Programs, 12/15/2022, pages 8-10.

Component [1]	Comment
"Placement of additional carts or revocation of cart sharing may be implemented by the City for cause. For example, if excess garbage is noted three out of five weeks a larger and/or additional cart may be required . . ."	Are City staff intending to physically check on each cart sharing property or rely on hauler reports? How will the City distinguish between excess garbage and "overflow" bags that incur a $3 per bag cost?
"The [opt out] application must include the location of the alternate waste disposal (transfer station, employment which allows disposal), with supporting documentation the stated option is available and/or has been used in the past."	Please trust resident to dispose of their garbage in an appropriate manner without having to document or explain their actions. Complaint-based inspection is more cost effective than applications and monitoring.

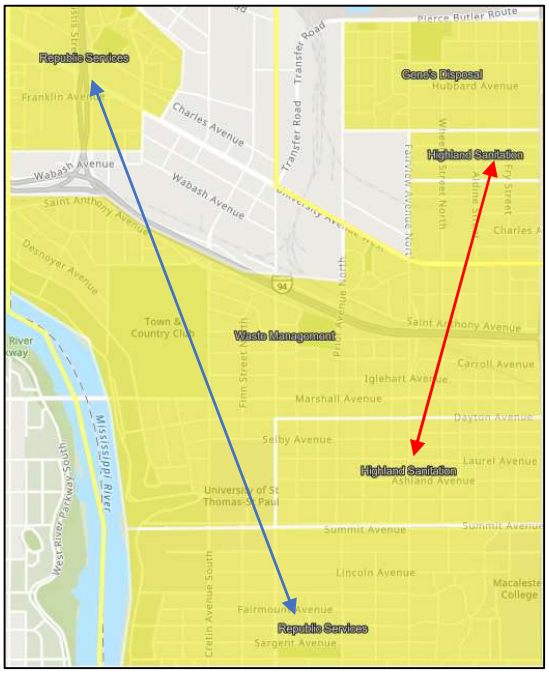
Owners of multi-unit properties can best determine the appropriate waste removal for their situation. Dumpster sharing between two multi-unit properties is more cost-effective than requiring each property to have a minimum number of carts.

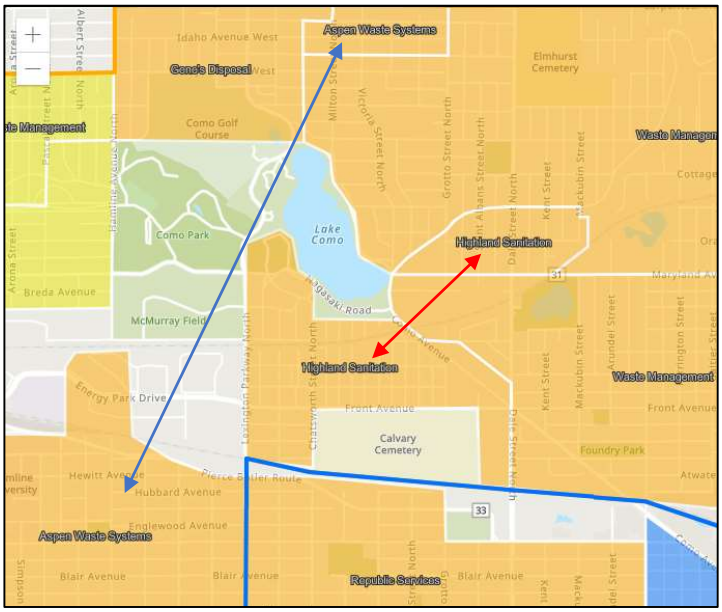
The City should establish the contract with the hauler(s) and allow owners of single-family and two-to-four-unit buildings to "opt in" to Coordinated Collection. Anyone desiring garbage service must hire the contracted hauler at the published rates. People wishing to cart share or use alternative disposal methods should not have to register with the City, pay a fee, and be monitored. Illegal dumping and overflowing garbage should be solely addressed through complaint-based inspection and nuisance abatement.

Change Route Assignments

Coordinated Collection can have greater environmental benefits and lower costs by assigning collection routes for maximum efficiency. Currently, some haulers have non-contiguous service areas for the same collection day due to the City's initial assignments

and hauler consolidation.[2]





Collection & disposal rates should increase with volume proportionately

The City should set volume-based garbage rates in proportion to the amount of waste collected, per City Ordinance 357.05 (c):

> Charges for mixed municipal solid waste services provided after July 1, 1991, must be submitted on a form provided by the inspector and based on the number of mixed municipal solid waste containers serviced by the licensee. Volume-based rates must be offered which limit the total amount of mixed municipal solid waste to be collected and shall be in proportion to the amount or weight of mixed municipal solid waste collected and shall differ significantly and incrementally one from another. At a minimum, volume-based rates must be offered for three (3) levels of single-family through fourplex residential service. The levels of service are for one (1), two (2) and three (3) containers of mixed municipal solid waste. Refuse haulers must provide written notice to their customers at least twice yearly of their volume-based rate structure and must provide information on their volume-based rate structure to new customers, including those acquired from other refuse haulers.

People can debate the appropriateness of allocating collection and disposal costs through various means. The City can set the rate structure as it desires. Waste reduction will not occur when garbage rates give substantial volume discounts for the larger cart sizes. The most equitable system charges each resident the same cost per gallon of capacity.

[2] Route examples from:
https://stpaul.maps.arcgis.com/apps/instant/lookup/index.html?appid=5b3d5ace287e428596cf18fd025fa6fb

Coordinated Collection should promote waste reduction and more recycling through price signals.

Should the City adopt the Public Works recommendation for a base fee and disposal fee. the disposal fee should cover the personnel and transportation costs for delivering waste to the Ramsey/Washington Recycling & Energy facility and not just the facility's tipping fee.

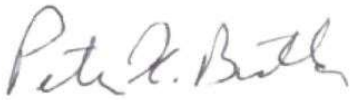
In any fee structure, the Every-other-Week cart's collection and disposal costs should be half of the cost for the same sized weekly cart. No collection costs for the off-week should be allocated to the Every-other-Week customers.

Bulky item collection is unneeded and overpriced

Residents pay approximately $2.1 million annually with taxes for bulky item services, though utilization is very low. In contrast, Public Works' spent $703,000 in 2021 to clean up reported illegal dumping[3] (page 16). It is far more cost effective for the City to pay the clean-up costs than to charge residents for largely unused service.

Public Works' recommendation for expanding the number of base items to six annually is unsupported by experience. The appropriate change is to reduce the bulky collection costs by two-thirds or make bulky collection an optional service.

Sincerely,



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[3] Public Works Recommendations for Garbage and Recycling Programs, 12/15/2022, page 16.