

# SNOHOMISH COUNTY RESPONSE TO WUTC QUESTIONS

Docket TG-112162

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## I. Recycling Revenue Sharing Plans

### A. What is the meaning of “increase recycling” under RCW 81.77.185?

#### 1. Please identify and describe all ways a solid waste collection company could “increase recycling” within the meaning of the statute.

We have reviewed draft comments developed by King County and reiterate, expand upon and supplement their responses in these comments. Unless called out specifically in the responses below, “recycling” is meant to include both typical recyclables such as glass, metals, paper and plastics, as well as the organic stream including yard debris and food waste. Text is meant to apply to both single family and multi-family services.

It is important to recognize that the primary guiding statutes relating to recycling are in RCW 70.95, which assigns the primary responsibility for adequate solid waste handling to local government and provides direction for development of local comprehensive solid waste plans. Recycling, as defined in RCW 70.95.030(18), means transforming or remanufacturing waste materials into usable or marketable materials for use other than landfill disposal or incineration.

One of the legislative findings in the chapter [70.95.10(5)] states:

*Source separation of waste must become a fundamental strategy of solid waste management. Collection and handling strategies should have, as an ultimate goal, the source separation of all materials with resource value or environmental hazard.*

Snohomish County, like other counties throughout the state, has developed local comprehensive plans that have a variety of programs to maintain and increase recycling, and they have included a wide range of activities involving the private sector. These include curbside and drop off services for residents, services for the collection or drop off of recyclable construction and demolition debris, providing for the processing of recyclables and organics, and product stewardship programs, which may include curbside collection through solid waste collection companies or may involve private or public sector-provided drop-off locations for materials not safely, practically, or effectively collected through curbside services.

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Consequently, the Snohomish County plans have included diverse strategies for increasing overall recycling that include, in part, optimizing residential curbside and multifamily collection programs and relying on the solid waste collection companies and their service providers, such as material recovery facilities, to play significant roles and attain significant results. This includes making infrastructure improvements, providing ongoing education, promotion and incentives, and providing information to their residential customers for supplemental waste reduction and recycling programs not available through the providers of curbside service.

Actions that could be taken by a solid waste collection company to increase recycling include:

**Increase the amount of recyclable material collected that is successfully processed such that the material collected is actually recycled.**

Increasing the amount and types of material collected curbside may increase recycling, but only as long as the materials collected are actually recycled. This means that they must be successfully separated from other materials and are separated into the correct commodity streams. This may be difficult for the WUTC and local governments to verify, though local governments are likely in the better position, through revenue sharing agreements, to require and access documentation. Increasing the amount of recyclable material collected is a reasonable indicator of increased recycling, though the real indicator is the amount of collected materials that end up in the correct commodity stream and are marketed for recycling.

It is also important to consider increasing quantities of recyclables within the context of the State's solid waste management hierarchy as stated in RCW 70.95.010(08), which establishes waste reduction as the first priority for collection, handling and management of solid waste. By definition, waste reduction means reduction of all discarded materials, whether they would otherwise have been disposed or recycled. Consequently, a more meaningful way of evaluating success at increasing recycling amounts is to track increases in the recycling rate, or the percentage of solid waste that is recycled instead of disposed or incinerated.

Actions that collection companies can take to increase quantities of materials collected and successfully processed such that the material collected is actually recycled, include:

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- Increase the number of subscribers to curbside and multi-family collection by promoting collection programs and providing incentives to sign up
- Increase convenience of curbside and multi-family recycling by providing customers with wheeled carts with sufficient capacity and providing in-home containers to multi-family residents
- Increase frequency of recycling and organics collection (and decrease frequency of garbage collection)
- Accept additional recyclable materials in recycling containers and ensure that they are captured at the MRF in the correct commodity stream to ensure successful recycling
- Increase the number of subscribers to organics collection by promoting collection programs and providing incentives to sign up
- Educate residents (correctly) about what materials are accepted in recycling and organics containers and what materials must be handled in other ways, such as through drop-off programs provided by retailers, reuse organizations, product stewardship programs, and household hazardous waste facilities, and what materials are acceptable as garbage.
- Motivate residents to maximize use of recycling and organics containers for the correct recyclable material and to maximize use of supplemental recycling opportunities (such as returning plastic bags to grocery store collection programs).

It should also be noted that motivation and education programs are needed in order to maintain curbside and other recycling at current levels.

- **Increase the marketability of materials collected for recycling.** Recycling entails the transformation of materials with no (or lost) value into a positive value. A key element in increasing recycling is to increase the value of the material. Turning garbage into gold is better than turning garbage into lead. Actions that collection companies can take to increase marketability and value include:
  - Only accepting materials for recycling that are able to be successfully separated from other materials at the MRF and will make it into the correct commodity stream, and not be lost to recycling as a residual or a contaminant in other commodity streams
  - Educating customers about how to prepare recyclable materials and which materials should not go in the recycling container
  - Tagging recycling and organic containers with excessive contamination and refuse pick-up for repeat offenders

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- Increasing the value of recycled material processed by MRFs for sale to end users through equipment, process and marketing improvements
- Further minimizing the contamination of curbside recyclables with non-curbside recyclables and hazardous materials by educating customers on proper handling and other recycling/disposal options
- **Increasing sustainability of recycling systems**
  - Diversification of markets
  - Promotion of and incentives for customers to “close the loop” by purchasing recycled content products, such as locally produced compost made from curbside-collected food and yard waste.
  - Assist to develop or increase markets for locally produced compost made from curbside-collected food and yard waste, such as providing incentive for its use in local community gardens and truck gardens
  - Reducing greenhouse gas emissions associated with curbside recycling

**2. For each way identified, please identify or suggest quantifiable measures for determining whether a recycling revenue sharing program could demonstrate that the plan will increase recycling in that way.**

Table 1 summarizes the measures that we believe for assessing the activities above.

**3. If the measure is inherently difficult to quantify due to being a new program or a program intended to modify consumer behavior, please suggest a framework by which the Commission can assess results using objective criteria, or perhaps refer to assessment models that have been used in other industries.**

Most of the program elements are intended to modify consumer behavior. It is extremely difficult to link program expenditures directly with outcomes because there are many, many other factors concurrently influencing consumer behavior. This problem is compounded by the short timeframe of revenue sharing agreements and the unavoidable delays inherent in gathering and analyzing recycling data.

In the early 1990's, Snohomish County opted not to contract for residential recycling collection services and to allow certificated haulers to collect residential recyclables in unincorporated areas under WUTC regulation. As a result, we do not have the direct contractual arrangement with recycling service providers that many cities in Snohomish County do. The revenue sharing

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agreements provide an opportunity to establish a proxy contractual relationship with the certificated haulers to carry out educational and motivation programs as well as infrastructure improvements.

We believe that it is Snohomish County's responsibility to work with the haulers to develop programs that we mutually believe will increase recycling. It is also primarily Snohomish County's responsibility to assess whether programs have had a positive effect.

## **B. Should companies be required to prepare a budget of anticipated retained revenues and expenditures under the recycling revenue sharing plan?**

Yes.

### **1. If actual revenues materially differ from those anticipated, should the company, in consultation with the County, independently manage and prioritize expenditures on plan activities to reflect actual revenues, or can and should the company and the County formally modify the budget and revenue sharing plan during the plan period?**

Plans should require the company to compare actual revenues and expenditures with projected revenues and expenditures on a quarterly basis. If revenues are less than projected, the budget and work plan should be adjusted and WUTC staff should be notified. If revenues are significantly higher than projected, the company and the County should be allowed to revise the plan and re-file it with WUTC along with a County certification that the revised plan is consistent with the local comprehensive plan.

### **2. If plans are modified during the plan period to accommodate unanticipated circumstances, to what extent should the company be required to seek, and the Commission be obligated to grant, approval of such modifications?**

It is our hope that this dialog will result in more clear direction about what sort of incentives are appropriate for companies. Our belief is that the County should have authority to approve revisions in plans to increase or decrease expenditures on programs, and that incentives to the company should be based primarily as a percentage of those expenditures. WUTC should be notified of changes in expenditure levels. As long as the incentive structure is maintained and expenditures fall under the maximum percentage allowed to be retained under the agreement, WUTC approval should not be required.

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## C. What are permissible expenditures under recycling revenue sharing plans?

### 1. What general types of expenditures (e.g., annually recurring expenses, equipment costs, cash payments to affiliates or third parties to be used for recycling related activities, personnel, advertising, etc.) can and should be funded with retained recycling revenues, rather than included in general base rates for recycling service, and why?

- **Recycling education and motivational programs.** We believe that this is a primary function of revenue sharing programs and has proved to be very beneficial. It includes staffing and development of materials for a variety of media. When revenue sharing programs were initiated in the early 2000's, certificated haulers had limited resources and expertise in educating the public about recycling, relying primarily on local government. In the intervening years, companies have become more sophisticated in their public education, due in large part to competitive pressures to fulfill requirements of city collection contracts. At the same time, the county's budget for recycling education and motivation programs, funded primarily by tipping fees from decreasing amounts of garbage, has been reduced. The revenue sharing programs, as they have evolved over the last few years, allow us the opportunity to utilize the companies' expertise in a quasi-contractual relationship and focus their efforts on activities that we believe will most greatly benefit recycling. It is hard to imagine how the County could have as great a level of influence if these activities were funded through base rates. Also, while the companies increased their expertise, applying it to contract cities, staffing levels to provide similar effort in WUTC areas was lacking. The revenue sharing agreements have allowed the county to request staffing increases to address education and outreach needs in WUTC regulated areas.
- **Data collection, reporting, and evaluation.** Although our county code has provisions for data collection, there are no "teeth" in the code, or consequences if data is not provided or is inaccurate. The revenue sharing agreements have provided us with leverage to get timely and higher quality data from companies, including requests for specific sub-areas of the county and company cooperation in measuring contamination in the recycling stream. We do not believe we could ensure an equivalent level of responsiveness if all costs for these efforts were in the rate base.
- **Equipment costs.** We agree that, generally speaking, equipment should be included in the rate base. However, if the company demonstrates that purchase of specific equipment could increase the amount of material

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recycled or the value of material recycled, we believe it is an allowable expenditure.

- **Material recovery facility improvements.** Both Republic/Allied and Waste Management, the companies serving most of Snohomish County, send most collected recyclables to MRFs owned by affiliates. We believe that it is appropriate to have a portion of expenditures for MRF improvements paid by revenue sharing. The portion should be equivalent to the proportion of material processed that came from the area covered by the revenue sharing agreement.
- **Incentives.** New approaches involving customer incentives might be needed to get more of the materials that should be in the recycling container put into it. Recyclebank is one form of incentive program. Investments in incentive program pilots should be allowable expenditures.
- **Market development activities.** There are probably any number of possible market development activities that have yet to be explored, or have been minimally explored. Examples include partnering with compost facilities to provide price-discounted compost to yard/food waste customers or to local community gardens and truck farms. These activities help customers understand the importance of recycling and not contaminating organics, and help improve the sustainability of local recycling.

## 2. What types of performance incentives (i.e., funds a company may retain in excess of amounts spent on plan activities) are acceptable?

### a) *Should a company be entitled to a performance incentive bonus solely for completing activities required under the plan?*

In Snohomish County's case, no. We believe the primary bonus should be based upon a pre-determined percentage of expenditures spent in completing the activity. Any expenditure over the initial budget would need to be pre-approved by the county. Experience has taught us that there can be a wide interpretation of what completing an activity can mean. Investing little in sending out incorrect or poorly formatted instructions is not the same as investing in the time and talent to provide correct instructions that are easy to understand. Hiring a consulting firm on the cheap to do focus groups is not the same as getting the quality talent to advise on focus group questions and conduct well documented and multicultural focus groups that actually inform next steps. It is possible to "complete an activity" at low cost but also low value. To reward companies for doing so by keeping "the difference" is not in keeping with the intent of RCW 81.77.185, nor does

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it serve the rate payers or meet the goals of the County's Solid Waste Management Plan.

**b) *Should performance incentives be limited to achieving or exceeding plan goals or objectives?***

No. Performance incentives should be based primarily upon the company fulfilling its work plan tasks on time and in budget. These work plans are developed with substantial input from the county and represent our best attempts to move the recycling needle based upon our professional judgment.

We also think it is appropriate to provide a bonus for achieving measurable gains in recycling or in subscription levels for organics programs. However, short term changes in household recycling behavior can be driven by many other factors, most notably changes in the economy, but also by major media campaigns by surrounding jurisdictions, contract cities, competitors, or producers of paper and packaging. Consequently, we think this is a less reliable measure than a bonus based upon fulfilling work program tasks.

**c) *Should the amount of performance incentives be limited to a fixed dollar amount or percentage of revenues, and if so, what level or range would be most appropriate?***

The primary performance incentive should be a percentage of allowable expenditures, not revenues. If revenues are lower than projected, allowable expenditure levels should be reduced. In recent plans we have submitted, we have proposed an incentive equal to 5% of expenditures. It is difficult to make an apples-to-apples comparison of this proposed number with the profit levels in our consultant contracts, who are also allowed compensation for overhead expenditures. We would be pleased if WUTC staff determined an incentive level based upon guidelines they believe to be appropriate, bearing in mind that the companies are in essence serving as consultants to the county.

**3. *Is a general return on plan expenditures permissible?***

**a) *Under what circumstances, if any, should the company be granted a general return on its expenditures under the plan?***

As discussed in #2 above, a pre-determined percentage return based upon budgeted plan expenditures should be the primary incentive payment to the company. If the county is dissatisfied with company performance on plan tasks, the county may recommend to WUTC that



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the incentive and/or other company plan-related expenditures be returned to ratepayers.

**b) *Should the amount of any general return be limited to a fixed dollar amount or percentage of revenues, and if so, what level or range would be most appropriate?***

As discussed in #2, a general return should be a percentage of expenditures, not revenues.

**c) *Do companies have incentives to participate in recycling revenue sharing programs other than earning a return on plan expenditures (e.g., complying with county solid waste plans, using retained revenues to finance equipment or other costs, as a means of experimenting with different recycling techniques, etc.)?***

In our opinion, companies do have incentives to participate in some elements that we have incorporated into our recycling plans, such as using retained revenues to improve MRF equipment. However, without a return on expenditures, there is little incentive for companies to spend resources improving their educational and motivational outreach to WUTC-regulated areas. A primary driver for the improvements in company recycling outreach in recent years has been competitive pressures to meet contract city expectations. Those competitive pressures do not exist in WUTC-regulated areas. Without direct financial incentives to focus on WUTC customers, it is likely that a disproportionate amount of company educational efforts will focus on contract cities, and consequently recycling levels in WUTC-regulated areas may lag behind.

## II. Process Issues

### A. What is the role of the Counties under RCW 81.77.185?

**1. How should Counties consider or negotiate financial conditions in the plan?**

The company should be required to submit a line item budget for performing work tasks. The County should review the work program tasks for reasonableness and our professional judgment regarding the need for, utility of, and value of the activity. Incentive levels should be established by WUTC through rules or guidelines through the process we are now engaged in. Initial budgets should be reviewed by WUTC staff when revenue plans are submitted, especially with an eye for duplication of costs in the rate and through the

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revenue sharing agreement. The company and the county should respond to any concerns about budget detail or assumptions within WUTC deadlines.

**2. Are there ways in which the Counties and the Commission could collaborate on development and approval of plans, rather than have each governmental entity conduct its own independent process?**

Any collaboration that would help reduce the frequency of suspended revenue sharing plans would be an improvement. If the process we are currently engaged in results in more clear guidelines for the structure of plans, we will have made a significant step forward. However, at the least, the plan approval process should include a timeline for the company and county to present a draft plan and budget to WUTC staff, and a timeline for receiving comments back from WUTC staff. It is our position that the utility and the detail of the tasks should be left to the county and solid waste companies, with the WUTC providing budget and rate oversight and regulation.

**B. What is the role of Commission Staff in development and County review of plans?**

**1. Should Staff participate in negotiations between a County and a company in the development of a plan?**

No. The Commission should come up with clear guidelines about incentives and, to a lesser degree, the types of activities that qualify as increasing recycling, recognizing that County staff are the subject experts on what is going to help recycling within the County. WUTC staff does not need to be involved in negotiating plan activities. It does need an opportunity to pre-review the Plan to ensure that it addresses the guidelines.

However, there are tools that the Commission could provide that would assist counties in assessing the quality and performance of recycling provided by regulated companies, whether participating in revenue sharing agreements or not. This is discussed in an additional section we have added at the end of this document.

**2. Should the County and/or the company seek Staff input on drafts of the plan and, if so, at what point(s) in the process, and how much time should be allowed for Staff to review the draft(s)?**

Yes, WUTC staff should have an opportunity to review a close-to-final draft. The length of time needed depends upon whether clear guidelines have been developed. We defer to Staff as to how much time is needed, however, the plans to date have been challenging to develop based on previous year's performance and lessons learned, negotiation, presentation to local Solid Waste Advisory Committees, and submission to meet WUTC deadlines. Additional

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coordination should be done in such a way to streamline and improve what is currently an administratively time consuming and costly process. Adding additional steps and time to the process should be done with caution.

- 3. Should the Commission formalize such a consultative process either in a policy statement or rule, or should Staff and County officials be authorized to establish processes on a case-by-case basis?**

We believe it may be helpful to formalize the process.

## **C. When and what must companies file with the Commission?**

- 1. Must companies file the final plan and County certification as part of the original filing seeking approval of the plan?**

No opinion.

- 2. What supporting documentation should companies include in their filings to make the requisite demonstration of how the retained revenues will be used to increase recycling?**

The plan document, budget, county certification, and revenue projections are essential documentation and the companies should be expected to provide the WUTC with a report regarding results with samples of deliverables. Work plan items should include a statement of why the company and the county believe the work will benefit recycling.

- 3. Should all companies be required to use the same plan period (e.g., a calendar year)?**

Snohomish County is attempting to harmonize, to the degree possible and beneficial, Revenue Sharing Agreements with King County and between Waste Management and Republic. As such, it is strategically and administratively most effective to harmonize the plan periods. For instance, as we negotiate and determine what materials are effectively collected curbside, it is problematic to have those decisions made 6 months apart by the two companies, while they share the same media shed for advertising. We need to be negotiating simultaneously with both companies.

Also, it may be worth considering if there is benefit to having the revenue sharing plans cover a two year period, with a one year adjustment. Once some of the issues addressed through this process are resolved, one year plans may function more effectively. Currently it seems that the plans are in a constant state of proposal, revision, submission, extension, review, etc., with the time available to implement squeezed from both ends. A two year plan period might help.

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**4. When should companies make their filing to enable Staff and the Commission to review and make a determination on those filings?**

No opinion.

**D. Which of the issues in Sections I and II A-C above would be appropriate for resolution in policy or interpretive statement to be issued by the Commission?**

All

**E. Are there any other issues that the Commission should address in a policy or interpretive statement?**

It would be good to have some direction about disposition of unspent revenues and options if expenditures exceed revenues. For example:

- If revenues drop drastically during the plan period and expenditures surpass revenues, can the company use revenues from the next plan period to compensate the loss? We think this would be acceptable.
- If revenues increase dramatically and the company wants to propose expenditures that would carry forward into the next plan period, could they carry revenues forward? We think this would be acceptable if the expenditure meets our approval.

**F. Should the Commission conduct a rulemaking?**

**1. Should the Commission promulgate a rule on filing requirements for recycling revenue sharing plans?**

We are uncertain whether or not a rule is preferable to a policy document.

**2. Should the Commission revise its existing customer notification rules to enable County input on the content and frequency of notices on recycling?**

We think it unlikely that changing the rule would in itself result in the document quality and coordination with the County that we get from revenue sharing programs. Even so, it would be beneficial to revise this as there are areas of Snohomish County not covered under revenue sharing agreements and there are counties that have no revenue sharing agreements that might also benefit.

**3. Are there other aspects of recycling revenue sharing programs that the industry or Counties request that the Commission address through a rulemaking?**

We think it would be beneficial, whether through rules, policy or other means, for the Commission to help make it clear that the revenue sharing agreements

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are not an entitlement at a set percent, but that the agreements should address actual agreed to needs and opportunities. The budgets should be set to match the need and opportunities, not to meet a set percent of retained revenues, such as 30% or 50%.

## III. Additional Issues

### A. Are there other aspects of recycling programs that the Counties request that the Commission address?

Yes, it would be helpful if the Commission could consider how to assist and address some additional issues.

#### 1. Baseline recycling performance metrics and comparisons.

We are unaware of how the Commission and staff determine the recycling performance of regulated solid waste companies that do not participate in revenue sharing plans. What is the expectation of companies operating without revenue sharing agreements? It doesn't really make sense to accept any level of recycling performance without revenue plans, but only expect higher performance if plans are in place. Of the materials regulated companies accept for recycling, what portion of the waste stream are they successfully collecting and processing for recycling? What should it be? As stated above, a meaningful way of evaluating success of curbside and multifamily programs generally could be to track and compare increases in the recycling rate, or the percentage of solid waste that is recycled instead of disposed or incinerated. It would be useful to have a chart that shows the recycling rates for each WUTC regulated service and whether or not those areas are covered under revenue sharing plans. This would provide a baseline for comparison over time and could help show if revenue sharing plans are creating greater results than non-revenue sharing areas. It could also help local jurisdictions and companies easily find information on "high performers" and potentially emulate their activities that appear to be providing success.

Likewise, we have no easy access for comparison to what is the cost of service per pound of recyclables collected, what is the rate paid by customer, what is collected in the program, what does the MRF charge for processing, etc. We think the WUTC should get copies of the latest instructional materials produced and circulated by the companies, and these materials should be posted. This level of detail and transparency would be very useful if provided in an accessible format for governments, companies and rate payers.

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Ideally, the WUTC would also be able to gather information for comparison for contract cities. Are cities that contract for services achieving higher recycling rates than non-contract cities?

## 2. **Impact of contract cities on WUTC rate payers.**

As contract cities negotiate for more materials to be collected curbside, such as plastic bags, the increased costs incurred by MRFs of doing so might be passed on disproportionately to WUTC area customers (who do not benefit from contract negotiations), or WUTC area customers may be paying higher MRF costs than otherwise warranted, due to actions by contract cities that cause the MRFs to operate less efficiently. While we do not think the Commission and staff need to be involved with determining which materials can and cannot be collected, as this is the responsibility of local governments, it would be helpful to better understand the costs charged by MRFs for various programs and how those costs change over time. If the Commission has the ability to compile this information from rate filings into a single chart or document for review, that would be helpful.

Local news coverage has highlighted some concerns, but analysis would be needed to determine the impact on rate payers in WUTC areas.

<http://www.komonews.com/news/local/Organization-seeking-statewide-ban-on-plastic-bags-139332798.html>

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**TABLE 1: PROGRAM OBJECTIVES AND MEASURES**

<b>Program Objective</b>	<b>Examples of use of funds</b>	<b>Quantifiable measures for determining whether program demonstrates that it will increase recycling</b>
<p>Increase the number of subscribers to curbside and multi-family collection by promoting collection programs and providing incentives to sign up</p>	<ul style="list-style-type: none"> <li>• Advertising, notification &amp; educational materials and associated labor costs</li> <li>• Translation services</li> <li>• Focus Groups</li> <li>• MF program research</li> </ul>	<ul style="list-style-type: none"> <li>• Meet review, quantity, timelines and budgets specified in plan</li> <li>• Potential for performance bonuses based upon increase percentage of multi-family complexes utilizing recycling services when compared to baseline period</li> </ul>
<p>Increase convenience of curbside and multi-family recycling by providing customers with wheeled carts with sufficient capacity and providing in-home containers to multi-family residents</p>	<ul style="list-style-type: none"> <li>• Cart purchase</li> <li>• In-home container purchase</li> <li>• Customer notification &amp; education materials</li> <li>• Labor costs for pick-up and delivery</li> </ul>	<ul style="list-style-type: none"> <li>• Meet quantity, timelines and budgets specified in plan</li> </ul>
<p>Increase frequency of recycling and organics collection (and decrease frequency of garbage collection)</p>	<ul style="list-style-type: none"> <li>• Customer notification &amp; educational materials and associated labor costs</li> <li>• Focus groups</li> </ul>	<ul style="list-style-type: none"> <li>• Meet quantity, timelines and budgets specified in plan</li> </ul>
<p>Accept additional recyclable materials in recycling containers and ensure that they are captured at the MRF in the correct commodity stream to ensure successful recycling</p>	<ul style="list-style-type: none"> <li>• Customer notification &amp; educational materials and associated labor costs</li> <li>• Translation services</li> <li>• Waste and recycling sorts, audits, bale breaks, and other activities to determine</li> </ul>	<ul style="list-style-type: none"> <li>• Meet reporting, review, quantity, timelines and budgets specified in plan</li> </ul>

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	fate of recyclables and contaminants	
Increase number of subscribers to organics collection by promoting program or providing incentives to sign up	<ul style="list-style-type: none"> <li>• Advertising, customer notification &amp; educational materials and associated labor costs</li> <li>• Translation services</li> <li>• Focus groups</li> </ul>	<ul style="list-style-type: none"> <li>• Meet quantity, timelines and budgets specified in plan</li> <li>• Performance bonuses based upon increase percentage of garbage customers that subscribe to organics collection when compared with a baseline period</li> </ul>
Educate residents (correctly) about what materials are accepted in recycling and organics containers and what materials must be handled in other ways, such as through drop-off programs provided by retailers, reuse organizations, product stewardship programs, and household hazardous waste facilities, and what materials are acceptable as garbage	<ul style="list-style-type: none"> <li>• Customer notification &amp; educational materials and associated labor costs</li> <li>• Translation services</li> <li>• Focus groups</li> <li>• School and community education</li> </ul>	<ul style="list-style-type: none"> <li>• Meet review requirements, quantity, timelines and budgets specified in plan</li> <li>• Performance bonuses based upon increased diversion rate when compared with a baseline period</li> </ul>
Motivate residents to maximize use of recycling and organics containers for the correct recyclable material and to maximize use of supplemental recycling opportunities (such as returning plastic bags to grocery store collection programs)	<ul style="list-style-type: none"> <li>• Motivational programs and materials and associated labor costs</li> <li>• Translation services</li> <li>• Focus groups</li> <li>• School and community education</li> </ul>	<ul style="list-style-type: none"> <li>• Meet review requirements, quantity, timelines and budgets specified in plan</li> <li>• Performance bonuses based upon increased diversion rate when compared with a baseline period</li> </ul>
Only accepting materials for recycling that are able to be successfully separated from other materials at the MRF and will make it into the correct commodity stream, and not be lost to recycling as a residual or a contaminant in	<ul style="list-style-type: none"> <li>• Waste and recycling sorts, audits, bale breaks, and other activities to determine fate of recyclables and contaminants</li> <li>• Negotiation with County and other parties over</li> </ul>	<ul style="list-style-type: none"> <li>• Meet review and reporting requirements, quantity, timelines and budgets specified in plan</li> </ul>



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other commodity streams	materials that can be properly handled, marketed, and recycled	
Educate customers about how to prepare recyclable materials and which materials should not go in the recycling container	<ul style="list-style-type: none"> <li>• Educational materials and associated labor costs</li> <li>• Translation services</li> <li>• Focus groups</li> <li>• School and community education</li> </ul>	<ul style="list-style-type: none"> <li>• Meet review, quantity, timelines and budgets specified in plan</li> </ul>
Tag recycling and organic containers with excessive contamination and refuse pick-up for repeat offenders	<ul style="list-style-type: none"> <li>• Cost of producing tags</li> <li>• Labor costs associated with tagging and monitoring</li> </ul>	<ul style="list-style-type: none"> <li>• Hauler documents incidents and provides information to County about effectiveness in changing behavior</li> </ul>
Increase the value of recycled material processed by MRFs for sale to end users through equipment, process and marketing improvements	<ul style="list-style-type: none"> <li>• Collect samples of collected recyclables according to County-approved protocol to assess quality of incoming materials</li> <li>• Upgrade sorting equipment and processes</li> <li>• Monitor and report on MRF residuals and cross-contamination levels</li> <li>• Waste and recycling sorts, audits, bale breaks, and other activities to determine fate of recyclables and contaminants</li> </ul>	<ul style="list-style-type: none"> <li>• Meet review and reporting requirements</li> <li>• Meet timelines and budgets specified in plan for sampling protocol</li> <li>• For MRF improvements, costs included in plan should be a proportional allocation based on tons or customer count.</li> </ul>
Further minimize the contamination of curbside recyclables with non-curbside recyclables and hazardous materials by educating customers on proper handling and other recycling/disposal options	<ul style="list-style-type: none"> <li>• Customer notification &amp; educational materials and associated labor costs</li> <li>• Translation services</li> </ul>	<ul style="list-style-type: none"> <li>• Meet review requirements, quantity, timelines and budgets specified in plan</li> </ul>

# SNOHOMISH COUNTY RESPONSE TO WUTC QUESTIONS

Docket TG-112162

Diversification of markets	<ul style="list-style-type: none"> <li>Increased use of regional and local end user markets for recyclable materials</li> </ul>	<ul style="list-style-type: none"> <li>Increased proportion of recycling tonnage from MRF going to regional or local end-users</li> </ul>
Promotion of and incentives for customers to “close the loop” by purchasing recycled content products, such as locally produced compost made from curbside-collected food and yard waste.	<ul style="list-style-type: none"> <li>Research and develop partnerships</li> <li>Customer notification, incentives &amp; educational materials and associated labor costs</li> </ul>	<ul style="list-style-type: none"> <li>Meet review requirements, quantity, timelines and budgets specified in plan</li> </ul>
Assist to develop or increase markets for locally produced compost made from curbside-collected food and yard waste, such as by providing incentive for its use in local community gardens and truck gardens	<ul style="list-style-type: none"> <li>Research and develop partnerships, provide incentives, and associated labor costs</li> </ul>	<ul style="list-style-type: none"> <li>Meet review requirements, quantity, timelines and budgets specified in plan</li> </ul>
Reducing greenhouse gas emissions associated with recycling	<ul style="list-style-type: none"> <li>Upgrades to equipment</li> <li>Upgrades in routing efficiency</li> </ul>	<ul style="list-style-type: none"> <li>Proportional allocation of costs to customers in area covered by plan</li> </ul>