

Point Recycling &

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Dave Danner
WUTC

WASH. UT. & TP COMM

RE: Background on Point Recycling and Refuse

Dear Dave,

So, I will try and give you a good understanding of the situation here in Point Roberts, it may ramble a bit but there is a lot to cover.

As you can see from a map, Point Roberts is geographically and politically isolated from the rest of Whatcom County, the State and the Country. It is a four square mile peninsula that can only be entered through Canada and a Border Crossing. I literally have to show my passport and explain my purpose and declare goods every time I leave town. The town itself isn't much, a marina, grocery store, hardware store, a few struggling restaurants and some gas stations. About 70 percent of the property is owned by Canadians. The children are bused over to Blaine for school. Not many families, mostly older retirees, second homes, and cabins for Canadians. No real industry other than a small amount of construction, maybe 10 to 20 new homes per year. It is a hard place for Americans to live, basic services are so far away; while Canadians can't live here year round. The local economy of bars and cross border shopping really died in the early 1980's. There hasn't been a new viable commercial business open in the past 9 years. The commercial customer base for garbage has actually declined about 25% since I bought the company. I have 33 commercial customers, most are only one 1-1/2 yd dumpster each week or less frequently. Of the approximately 2,000 residential units, about 800 are full time occupied, the rest are infrequently used. I have 340 permanent residential customers(17%), another 160 regular "infrequent tag" customers(8%), and about 100 regular self-haul customers at the transfer station (5%).

History of Garbage Collection:

Regulated garbage collection was started sometime in the 1970's by Hank Peltier. He sold the company a few years later to Deborah Myrdal because he felt that there wasn't enough customers to make it work. Deborah Myrdal actually didn't even charge the customers for service, didn't send out bills. Service was unreliable at best. She eventually went bankrupt and the County foreclosed on the company to pay the outstanding disposal bill at the local County dump. The Company was sold to Barbara Mathews in the early 1990's. Barbara started to actually send bills to customers. This led many people to just cancel service, they had felt that they were entitled to free service. A significant dumping and litter problem occurred. Barbara asked the County to enforce the Universal Service Ordinance which required all households to be on service. The County was ineffective in doing so. Barbara tried to file a rate case with the WUTC, it was prepared by a former WUTC Auditor, Ed Nicula. The entire case was completely

denied except that the auditor did increase the monthly recycling rate. As I look back on that case, I fail to understand how the WUTC could absolutely refuse any rate increase, especially when the case was prepared by an ex staff member. Just looking at the company, earning only about \$100,000 per year, one extremely old garbage truck, some sort of increase would have been reasonable. So, Barbara went bankrupt also. In 1999, I purchased the company and inherited the problems. The one garbage truck had a complete structural failure of the packer body about two months later. If I hadn't purchased the company, it would have ceased to operate entirely within a few months.

Personal History:

I started in solid waste in 1991 as an intern with Whatcom County Solid Waste Division. I worked with them for a few years and then with a recycling education non-profit under contract to the County. My primary job was to research and study everything that I could find about recycling programs and try and adapt the cutting edge to Whatcom County. After graduating with a B.S in Environmental Policy and Assessment, I went to work for Nooksack Valley Disposal and San Juan Sanitation Company. My role there eventually became what you would call the operational manager, dealing with tariffs, contracts, daily operations, modernization of systems, and general problem solving. In 1999, I purchased the Point Roberts company but continued to work for Nooksack Valley Disposal until 2001. I have served on the Whatcom County SWAC for 10 years, currently I have to be off SWAC for a full term.

History of the Point Roberts Transfer Station:

The Transfer Station is owned by the County and located on the old County landfill. The landfill was closed in the late 1980's and replaced with a basic drop-box station consisting of 3 concrete Z-walls and a gravel parking lot. The site did not have phone, power, a scale, fences, or bathrooms, just an outdoor water faucet and an 8x10 shed. The County lost so much money operating the site that they turned operations over to the local garbage company under a revolving 5 year lease. The County sets all rates and services for the Station. The garbage company currently uses the station as a base of operations which is a benefit to the rate payers because the garbage company does not have any facility costs in the rates. The regulated garbage company is a customer of the transfer station and pays a fair and reasonable disposal fee. Over the past 8 years I have installed full utilities, a scale, an office and over \$150,000 in improvements to meet Minimal Functional Standards and provide the facility this community needs.

History of Point Recycling and Refuse Company:

I purchased the company in April of 1999. With the company I got the G-certificate, the transfer station lease, one 1986 garbage truck (it died a few months later), and a 1990 recycling truck (this truck finally just died). That was it.

I started with my brother who had been a driver for San Juan Sanitation, being the operational person in Point Roberts and myself trying to manage the company from Bellingham while still working for NVD. After about a year, I realized the challenges facing the company were too significant for me to manage it from a distance and so we moved to Point Roberts. I hadn't taken any pay from the company for the first year, and unable to support two people was forced to lay off my brother. I operated the entire company by myself, running non-stop all day every day for two years. I was eventually able to hire Jay as a driver though I couldn't really pay him what he deserved.

All this time, I was trying to modernize the company and the transfer station. We pretty much had to do everything ourselves because there wasn't the money to hire it out.

I got lucky and was able to get two used garbage trucks from the City of Mount Vernon (1989 and a 1993) and a bunch of used 1 1/2-yard dumpsters surplus from the City of Anacortes. All the existing commercial dumpsters were rotten.

I had to get a back-hoe to pack the drop-boxes at the transfer station to get the hauling cost per ton down. I had to cut the hauling bill (I didn't have my own roll-off at the time), so I would fill each garbage truck completely full and drive it down to Bellingham. One truck per week in winter, two trucks per week in summer. Absent a scale at the transfer station, this was the only way to accurately determine the disposal expense for the company (a problem in the previously denied rate case).

We finally got utilities installed at the transfer station, put in a scale and a junk single wide trailer as a scale house. Moved the office out of my house and opened the transfer station more days. Put in a cargo container as a shop, bought tools, welders and such, so we could make some simple repairs and start rebuilding dumpsters. Upgraded the customer computer system to a real program, went from a 1-month to a 2-month billing for residential.

Blew an engine in the 1989 garbage truck, replaced that. Burned a transmission twice in the 1993 garbage truck. Had to rebuild both packer floors and hoppers because the metal rotted out.

With the scale installed, went back to dumping the packers at the transfer station because the trip to Bellingham was too hard on the trucks. Eventually was able to get our own roll-off truck and containers.

With the scale installed, we went to weighing special containers and charging by the pound for disposal.

Had to fight with the County and the WUTC to get the infrequent tag service.

The old backhoe finally died, had to get a used replacement.

Had to replace the engine in the 1989 garbage truck again. We hardly use the truck but we must have reliable backup.

Numerous small and large mechanical calamities with the old equipment but never missed a pickup.

Ever more complicated Border logistics and delays.

Finally, after 6 years was able to have a stable system that we could model a rate case. There had been too many changes before that to have an accurate base year. This was the only successful rate case that I could find on record for the company.

Had to later raise rates at the transfer station due to direct disposal increases in Bellingham. Did a pass-through rate increase for the garbage company.

In 2006, was able to hire a second driver.

This really has been building something from nothing, every year adding a little more, but it is like trying to walk on water by pulling on your boot straps. This is a system that cannot break down, must always get the job done, and must always be improving. Jay and I have held this system together by sheer force of will despite illness, injury, breakdowns, bad weather, not enough equipment and not enough staff. The concept of a profit is impossible because every extra dollar must be put back into the company.

Characteristics of Point Roberts:

Point Roberts is isolated, things are complicated here. You have to go into Canada or to Bellingham for everything. You can't get mechanics or tire repair trucks to come here, often broken trucks have to be towed into Canada. Parts are slow to get.

You will always under utilize your capital equipment and you have to have backup.

Most households don't use the system in any form. Illegal burning and dumping is a significant problem. Much waste is hauled illegally into Canada. Commercial business (few that there are) carry the weight of supporting the system and also get dumped on by the residential. There is a long history of the majority of this community not supporting the utility. Many people want it to be like the old days, burn or bury anything you want. If you were friendly with the County dump operator and brought him a six-pack of beer you got to dump for free.

There is a fundamental lack of understanding how the regulated utility works, that rates are an economic reality, fair and reasonable. That when people attack or undermine the system, it means everyone else pays more. That intrinsic in the system is a commitment from the Company to serve and a reciprocal commitment is placed on each business and household to support the system.

The system still needs substantial improvements.

The equipment is aging.

Garbage trucks: 1989 and 1993

Roll-off Truck: 1996

Recycling Truck: 1990 (just blew the engine – program is dead)

We need to purchase a new garbage truck as soon as possible, and then get another new one every seven years.

We should have backup on the roll-off truck because when it is in the shop, we cannot move the garbage out of Point Roberts.

Replace the back-hoe in 5 years.

Replace just about every commercial dumpster: at least 40 over the next two years.

Purchase two more 40-yard bins, and a 30-yard bin for the transfer station.

Should get four more 12-yard bins.

We need to upgrade the scale and garbage billing software.

The transfer station still needs improvements.

Each one of these purchases, on its own, is a substantial project in implementation let alone expense.

Curbside Recycling:

This program was never feasible. I have been trying to get it shut down for 7 years. 340 customers total, the same number as in 2001. Approximately \$21,000 per year gross revenue. Since there has been absolutely zero customer growth in 7 years, it would be impossible to contain rates just from inflation let alone afford to replace equipment. If I raise rates, customers go off service. The recycle truck blew the engine in February and I shut down the program. I notified my customers that they could bring in their recycling to the transfer station at no charge. I also notified the County and Gene Eckhardt. As of today, nobody from the County or the WUTC has called me. The County sent me a letter informing me that I was in violation of their Service Level Ordinance and ordered me to correct the situation within 60 days or they would take further unknown action. Technically I am in violation of my Tariff and the County's Service Level Ordinance. I have provided the County with substantial analysis of the situation but the County is unable to make any decisions. I asked the WUTC staff to conduct a feasibility of the program and they refused. The Department of Ecology does not require the County to have a curbside recycling program. In Point Roberts, nobody is further than one mile from the transfer station and a self-haul recycling program is the best and only feasible option. I have a couple of elderly customers who cannot bring in their recyclables, so I go and pick that up for them when they have enough. So, the service needs of my customers have been met to the best of my ability. I specifically notified my customers that they had the right to comment to the WUTC about my suspension of the recycling program. I have not been notified of any complaints. I have about 70 visits per week of self-haul recyclers so it appears that most people are continuing to recycle. The County Service Level Ordinance is designed to implement their Solid Waste Management Plan. Under the planning guidelines, the County is required to assess the recycling needs of both urban and rural communities (Point Roberts would be rural) and design effective and feasible recycling programs (either roadside collection or self-haul) to meet the needs of the community. The County has failed to do so. Roadside recycling collection is just a political whim, there is no analytical basis to determine that roadside collection is the best and only option or even feasible. Therefore, the Service Level Ordinance is not valid for Point Roberts. The WUTC is required to do a cost impact assessment on the rate payers for the County Plan. This has always been a rubber stamp process. The WUTC has failed in its mandate to protect the consumers by not doing a specific cost assessment of a curbside recycling program for Point Roberts. I have been stuck trying to accomplish an unreasonable task, not economically possible. Both the County and the WUTC have refused to listen to me. Why is it my job to convince the County that it is not possible? It is their job to prove that it is. Where do I go from here? I will not try to restart this program until the County and the WUTC can show me how to provide the service with reliable equipment (backup would be nice) at a sustainable rate level which won't drive customers off service.

I believe the County isn't going to make any decisions and I am in violation of my Tariff. I think that the only course of action for me is to file to remove recycling from my Tariff. This will start a 45 day clock and give my customers the formal avenue to express their needs. WUTC staff will recommend denial of the Tariff changes as they did in 2001. I will request that the WUTC actually do its job and perform a cost assessment on the County's Solid Waste Plan. How can the Commission enforce a plan that they never fulfilled their mandated cost assessment requirements. I will also notify the Department of Ecology that the County has failed to meet the planning guidelines for the current plan which is under review (urban vs. rural needs) and request that Ecology suspend plan approval until the County actually does an assessment on Point Roberts and the WUTC actually does a real cost assessment specific for Point Roberts.

It is very big project to clean up this mess. It will probably take at least six months.

Transfer Station Lease

I lease the Station from the County. The lease expires in October of this year. You would think that there would be an automatic renewal but I don't think that will happen. About 4 years ago, the County Zoning Department took action against the Calder family for operating their excavating and gravel trucking operation out of their residential property. The Calders decided that since the County wouldn't let them use their property as they saw fit, then the County owed them the Transfer Station. (I have documentation of this). So, the Calders have been harassing and attacking me ever since. They have convinced Councilperson Barbara Benner to try and remove me and let them take over the Station. This combined with the ongoing political situation that I have with the County over curbside recycling and Universal Service will make the Station renewal a complicated issue.

I have more than exceeded expectations in regards to the station. I have made substantial and necessary improvements while trying to further the County's recycling goals. I operate the site more days and hours required by the County.

I believe that the County will fail to understand that the Garbage Company and the Transfer Station have a necessary symbiotic relationship. Neither can exist without the other.

The Garbage Company does not pay any land or building cost. Therefore, that cost is not in the rates. If the Garbage Company was forced to relocate off site, a substantial rate increase would be required to cover that cost. Relocating would cost at least four times gross annual revenue. Even if a location could be found, (there is no land zoned for it in Point Roberts), the company wouldn't be able to afford it or survive the process.

The Garbage Company has equipment and services that cannot pay for themselves at a reasonable rate. The Garbage Company has to have a roll-off truck but there isn't enough volume to cover the truck costs. Especially when the illegal poachers are taking over half of the drop-box volume. So, the Transfer Station pays for the truck and in a rate model, the Garbage Company pays what it can. This is the same with the pickup truck that we use for special cleanups, getting appliances and stuff from customers. The pickup fees cover that labor and the Transfer Station pays for the truck.

My compensation, utilities, insurance, and overhead are all allocated to be benefit of the garbage collection customers.

Forcing the Garbage Company to stand on its own will result in substantial rate increases and destroy the company.

The relationship also benefits the Transfer Station. There are not enough customers to justify the Station being open to the extent we are. We have days we get only 15 customers, a couple of hundred dollars gross income for an entire day. We are able to be open and serve the community because we are also doing other work here for the garbage company. Allocations also work to the benefit of the Station.

I own all infrastructure improvements at the Transfer Station and have the right to remove them if the lease is terminated. The County has forced me to shoulder the burden of developing this site without any support or assistance from them. I have done my job to serve this community. I

would not be inclined to leave anything of a functional station for them to give to my enemies. They can have exactly what I started with, a parking lot and nothing else.

The WUTC needs to convince the County of the fundamental economics of this system. That it exists to serve the community. That as a regulated economic model, separating the Transfer Station from the Garbage Company would have a profound impact on all the users of the system.

The Station issue needs to be settled. The curbside recycling program is dead and will never be restarted because it is not economically viable and was a design failure on the part of the County. The regulated Garbage Company is not able to cross-subsidize curbside or self-haul recycling. The only way to fund recycling is to have the Transfer Station garbage rates pay for it.

So, this is the Transfer Station Lease that I need and it has to be done with the minimum of politics.

The Lease needs to be a 20-year automatic renewal lease specific to the owner of the G-Certificate. As long as anyone thinks that they have a chance of taking over the Station, they will continue to attack and undermine the Company. This lease is in the best interests of the community and the rate payers.

Within the lease, the requirement of providing free self-haul recycling to all residents in Point Roberts, I may even be willing to provide free self-haul recycling to commercial businesses. This action will probably increase recycling by 3 or 4 times the current volume. The County implements full Universal Service so that people's garbage is funding recycling.

I am willing to pay a "fair market" rent for the site provided that all rents are earmarked by the County to fund improvements to the Station. There are a lot still needed.

If I pay a fair market rent, I need to right to conduct other business operations from the site. If the Company is able to diversify or use equipment for other income, the more allocated costs benefit the rate payers.

With a 20-year renewing lease, all Station improvements become the property of the County

Universal Service

Whatcom County has a Universal Service Ordinance but they have refused to enforce it or implement it. In Point Roberts, only 17% of the households are on regular service. Imagine, only 17% route density. This places a huge burden of supporting the system upon the few commercial customers and contributed to the Marina pulling out of the system. I was able to get increased revenue from the "special clean-up" services which used to be about 25% of the company revenue. The illegal poachers have taken most of that. Residential customer numbers have been completely flat for 7 years. I believe that the only way to stabilize this system, to insure that service will be able to continue at any sort of reasonable rate is to implement full universal service.

WUTC Staff:

To put it bluntly, I think that Staff are incompetent. They are the epitome of paper-pushing indifferent dictatorial bureaucrats. They fundamentally fail to understand not only the relationship between the WUTC and the Haulers but also the fundamental purpose of the system. The WUTC and the Haulers are partners, bound equally in service to the community. The goal is to ensure that every community has a viable and sustainable solid waste/recycling system and achievement of the most optimum rates. This requires the WUTC to support the company, to ensure that the task set forth, the system design, is feasible; to protect the company from attack; and to help the community and County to understand the fundamentally fair nature of the system. I have repeatedly asked for help and have either been ignored or refused. I have tried being subservient, or analytical, or problematic and outright defiant. Nobody from staff has ever called me to offer assistance, maybe they call Brad Lovas so that he can try and get me to toe the line. Staff insist on defining their job on their terms, not the legal requirements, and deny the haulers any recourse. Staff commit to demonstrating their absolute power above the best interests of the consumers or the system. They fail to understand that their power isn't absolute; I do the work, provide the service, I am held responsible for the system and the rates. What are Staff going to do if I choose to not do this anymore? What happens if I can't find a way to hold this system together and make it work? We are partners in service.

G-Certificate Suspension:

I actually find this issue quit funny. This system is dying. If I don't find a way to get a pivotal change in attitude by the WUTC and the County then this system will collapse or I simply won't do it anymore. I have nothing to lose. It is like Staff want to put a gun to the head of a terminal cancer patient. The suspension clearly demonstrates Staff attitude and hostility to the Haulers. The misguided demonstration of power when they would prefer to destroy a system rather than fulfill their responsibility to participate in it's success. The annual reports are a trivial issue compared to what this system is facing. The WUTC is an auditing agency, if Staff really wanted the reports then they could have sent an auditor to get them. When I do another rate case, reports could have been a condition of approval. Who among Staff decided that this was the only course of action. Nobody has ever called me to offer assistance or to determine what the problem really was. Suspension action demonstrates how much Staff have failed to understand this system. I am so isolated that this territory cannot be serviced from the mainland or by any other company. Staff are willing to order me to stop collecting garbage without making sure that service will continue uninterrupted. Have they already lined up a successor company, cut a deal with the poachers? Staff would destroy a company without discussion or consent from Whatcom County. Who is responsible to the consumers when they no longer have garbage service, and probably never would again? Who will explain to the State Representatives when my ex-customers call them asking how could this happen? This is why Brad Lovas is so concerned about the cancellation going to trial. It represents a fundamental breakdown in the regulatory system. The system is intended for this to never happen. The system exists to ensure that all communities have viable, sustainable and reliable garbage/recycling systems. Apparently Staff so fundamentally fail to understand the purpose of the system that they just do not care about the repercussions. All I have ever asked is for Staff to support and assist me in doing my job. I have had to put pressure on them to get any action and their response is to try and destroy the company instead of addressing the problems.

Rates:

I am facing a 40%-50% rate increase. The cause is inflation, fuel, payroll, etc. The rise in the Canadian dollar caused a 40% increase in my cost of repairs and tires. The fundamental system design with only 17% of the households on service has a huge impact on the rates. My largest

customer, the Marina, has pulled out of the system. Another large customer the Bingo Hall has closed. Only 33 commercial accounts. Residential customer volume has been stagnant for 7 years and commercial is decreasing. The Poachers are getting over 50% of the special volume. This company has always been behind in rates, always forced to operated under staffed and under funded. Any excess revenue or rate increases are just playing catch up trying to build the system. Customers hold me responsible for the rates without realizing that I cannot make rates higher than they should be, nor can I make them lower without letting the system deteriorate. Rates are an economic reality, a model based on system design, participation and enforcement. I have been trying to get the County and the WUTC to change the system economics for years but nobody will help me. When I raise the rates, I expect almost all my residential "infrequent tag" customers to cancel service and switch to self-hauling. I will also loose probably 20% of the regular year round residential. The system has proven at the current rates, no residential customer growth, so when rates increase customer participation will drop dramatically. Of the commercial customers, I predict that at least 30% will drop service and self-haul their garbage. These are customers who have a garbage volume and characteristic that can be easily hauled in a pickup truck or trailer. So, the needed rate increase will result in a significant erosion of the customer base thereby negating any increased revenue. The responsibility for this increase rests firmly on the County and the WUTC for repeatedly refusing to participate in the system design and protect it from the attacks of the poachers.

The Future of This System:

This system is dying. It has been neglected for too long. The lack of residential participation has starved the Company of needed investment revenue and put too much burden on the few commercial customers. The poachers have had a profound effect on driving up the rates and undermining community support. For decades this community has under invested (in the form of garbage and participation) in the system and the required investment is now significant. Problems that should have been dealt with years ago have piled up into an overwhelming task. The County and the WUTC have hung me out with an unreasonable task and no support. How can I convince the community of the fundamental fairness of this utility when my two business partners (the County and the WUTC) refuse not only to participate but fail to understand their required roles and responsibilities. Given the current politics, system design, governmental attitude, and harassment of the poachers; I do not see this system surviving beyond October. And, I certainly do not want to continue pushing boulders uphill for years, bound to service, under constant attack; without a reasonable game plan and full governmental and community support. All I have ever asked from the County, the WUTC and this community is to support me in my job and make a commitment to the system equal to my own. I am exhausted from this. I don't want to do this anymore. It is not fun. I have had to shoulder the burden of this system alone for too long. I am willing to be a servant but not a slave.

My Next Action:

I have a responsibility to serve my community and to do anything that I can to save this system. I don't believe that is actually possible without the full participation and commitment from the County and the WUTC. I cannot go any further with this company. I do not know what equipment to buy, what to tell my customers, what the future is. I will have to go back to war with the poachers, try to get any government agencies to put pressure on them whether it is Licensing, the Border, Canada, Revenue, Ecology, the County, or the WUTC. If they cannot be stopped then at least things need to be difficult for them. I will open myself and my family to their counter attacks. This is not a war I should have to fight because I am bound to serve. It is the WUTC and the County who are to protect me and my customers. I expect to stop operating this system in October when the Transfer Station Lease expires. I am under no obligation to

leave anything for the County or the WUTC to continue this system. I certainly will not leave anything for my enemies. I own all of the operational infrastructure and will remove all of it. I will not pass on customer database, operational knowledge or a single piece of equipment. There will be nobody competent to take over the system and certainly nobody willing to invest in replacing everything. There will not be a garbage/recycling system in this community. So, while also fighting war to try and save the system, I will also be making preparations to dismantle it completely.

What Can Be Done:

The County and the WUTC have to get on board and participate in this system. All three of us are equal partners bound to serve this community. At long as I continue to operate then we are stuck with each other. I have done my job but my partners have fundamentally failed me and this community. We can stop the politics and sit down and get a reasonable and sustainable game plan for this system. As I have outlined; Transfer Station Lease, Universal Service, no poaching. Rates will have to go up, that is the price this community has to pay. Universal Service is the answer to that problem but it will take the rest of this year to implement. Year 2009 operates at higher rates with the staff and equipment the system needs, the WUTC sets stable rates for 2010 and ensures that the Company does not over earn in 2009, any excess revenue is put back into the system to benefit the consumer. This requires a huge amount of work on my part and commitment from the County and the WUTC to back me. It will take 3 years to stabilize the system and repair the damage done by the poachers and the neglect. Maybe in 10 years of hard work, I can get this company to a "turn-key" operation that I can sell. This system needs to be sustainable. It needs a solid game plan.

The WUTC needs to do the following:

1. Stop the poachers and not just the usual dog and pony show. These people need to be completely stopped and discredited in the community. Nothing that the poachers have ever hauled has been recycled and everyone pays more because of their harassment and attacks on the local utility. Staff seemed perfectly willing to destroy the G-Company, why not the illegal poachers? These people will continue to attack as long that they are able and allowed to do so.
2. Get the County to realize the fundamental structure of the system. It is an economic model that exists to serve the community. This system is either designed to succeed and be sustainable or it will fail completely.

I appreciate your time reading this and hope that we can make progress. I apologize for taking so long but I have lots of stuff to deal with. After you have finished this, please give me a call if only to let me know that you have read it. I rarely get a response from the WUTC for anything.

Sincerely,



Arthur Wilkowski
Point Recycling and Refuse Company