



PART II – BACKGROUND & ANALYSIS

1.0 Introduction & Purpose



“A long-range plan is good governance for today and tomorrow. It provides the City’s leadership, citizens, environmental groups and businesses with a best practices roadmap to Houston’s future and its array of solid waste services, programs and regulations. ***This Plan addresses our most pressing needs, including the need for financial stability for the valuable services provided to residents by the City, a more aggressive program to reduce waste going to landfills and assuring long-term disposal options for the City’s residents and businesses.*** I want to personally thank the members of the Mayor’s Advisory Task Force for their assistance in preparing this important plan.”

Harry Hayes
Former Solid Waste Management Department Director, 2007-2020

Houston residents rely on the City to provide quality solid waste management services to protect the health and environment of the community. To fulfill this obligation, the City provides a range of services to residents including the collection and proper management of recyclables, organics, and residential waste. The City also requires the business community to act responsibly in the management of its waste. Because of the complex nature of municipal solid waste (MSW) management, it is necessary to periodically evaluate the City’s waste management system and develop action plans to ***improve services, enhance the City’s environment and assure long-term disposal capacity. This Plan includes a move towards sustainable materials management as recommended by the US EPA.***

The **Integrated Resource Recovery Management Plan (“Plan”)** presents a comprehensive program that is intended to accomplish the following.

- Reduce the amounts of waste generated.
- Encourage greater material recycling.
- Reduce food waste and increase organics diversion.
- Improve the quality of service to residents.
- Combat illegal dumping.
- Assure long-term disposal capacity for municipal solid waste.
- Encourage the development of new technologies for reducing waste and recovering materials.
- Establish a sustainable fiscal program to provide SWMD services.

The planning period is 2020 through 2040. The Plan provides the City with recommended strategies that address City solid waste management needs through the planning period.

RESPONSIBILITIES: On a daily basis, Houston residents and businesses generate over 11,500 tons of MSW (a.k.a. trash), or 4.2 million tons per year. The management of MSW requires an integrated system that includes the following tasks:

- Collection of household garbage, recyclables, yard waste, tree waste, junk waste, tires, and household hazardous wastes;
- Enforcement of City policies that require apartment owners, businesses, and institutions to properly collect, process and dispose their waste;
- Utilization of transfer stations to reduce costs and the number of trucks traveling from collection points to final disposal and processing sites;



- Recovery of recycled materials at materials recovery facilities (MRFs) or one of several Houston businesses providing recycling services;
- Operation and maintenance of recycling centers, depositories, and environmental services centers to provide additional collection and recycling opportunities;
- Production of useful mulch and compost at one of several local facilities that process yard waste, brush, and a small amount of food waste;
- Management of wastes that are generated as a result of major storm events such as Hurricane Harvey and Tropical Storm Imelda;
- Disposal of MSW in one of the region’s 27 permitted operating landfills;
- Collection and proper disposal of waste illegally dumped at dump sites located throughout the City.

Working Towards Zero Waste



Some local solid waste management plans seek to eliminate all waste generated within its community. This Plan is intended to identify pathways towards zero waste.

The plan presents realistic strategies that will require a blend of public policies and programs that will encourage actions throughout the Houston community. These actions include a blend of education, incentives, and enforcement.

CHALLENGES: It must be recognized that to meet future challenges, the City must maintain a high degree of flexibility and responsiveness to these challenges. Some of the challenges associated with future waste management can be readily predicted, such as the expectation that the Houston region will continue to grow in population and Houston will continue to experience major storm events. Other factors such as those listed below are less certain.

- Potential storm events that are significantly greater than normal - similar to the magnitude of Hurricane Harvey
- Long-term economic conditions, specifically the availability of markets, and revenue for recycled materials
- Changes in the way products are manufactured and packaged that may affect the amount of waste generated and the types of waste generated
- The competitive nature of the local workforce affecting the availability and cost of collection crews and other SWMD staff
- Advances in technologies for processing materials including MSW
- Federal, State, or local laws that could affect collection or disposal
- Decisions by local solid waste businesses that could either increase or decrease regional landfill capacity

FINANCES: Houston’s FY 2021 solid waste management program is currently budgeted at \$88.9 million. The City also has a Recycling Revenue Fund to pay for materials processing, recycling collection vehicles, intradepartmental transfers and other efforts, which has a budget of \$4.9 million. The Plan evaluates the City’s financial resources in comparison to its core services and the need to enhance the local environment which may require an expansion of core services.

In comparison to other large cities and across the US, Houston’s solid waste budget is extremely underfunded.

In May 2020, the City adopted a cart lease program. This program is anticipated to raise approximately \$5.0 million per year.

The Project Team prepared comprehensive documents that were presented to the MATF as part of the planning process. These documents are considered appendices to the Plan and include the following.

- Waste Generation Report
- Facilities Report
- Waste Management Activity Analysis – Part 1
- Waste Management Activity Analysis – Part 2
Collection, Transfer Stations, Resource & Energy of Recovery, Landfill Disposal



History of Solid Waste Planning in Houston

Since 1988, the City has prepared a range of solid waste management plans and program reviews. Below is a summary of the key prior planning initiatives.

1988: Solid Waste Department published a 20-year plan for Houston Solid Waste Services.

1990: Mayor Kathy Whitmire commissioned the Citizens Advisory Committee on Solid Waste Disposal Solutions. The City also contracted with a consulting team to guide the committee and write the plan. Some of the key recommendations of this plan include the following.

- The City should initiate an integrated system to meet the City's long-term waste disposal needs. The integrated approach includes source reduction, recycling (including composting), waste incineration and landfilling.
- The City should implement an aggressive source reduction and recycling program. These are the preferred methods of waste management because these programs conserve natural resources and reduce the need to combust or landfill waste.
- The City should initiate actions to acquire and permit its own landfill for waste generated by the City's residential sector. *At that time, the City did not own a landfill; therefore, it relied on privately owned sites to meet its disposal obligations.*
- The City should continue to examine incineration, either in the form of waste-to-energy or for volume reduction specifically. (The economic conditions at that time - low landfill costs and low energy prices, did not favor implementation at that time.)
- The City should establish a dedicated waste management enterprise fund for collection and disposal of solid waste.

2006: Mayor Bill White commissioned the Solid Waste Task Force to review Houston's solid waste management programs and services. The Task Force was chaired by then Controller Annise Parker and Sanifill CEO Lorne Bain. Recommendations from this effort have been adopted or implemented, with the exception of a proposed enterprise fund.

2016: Mayor Sylvester Turner authorized procuring services for this Integrated Resource Management Plan (Zero-Waste Plan) to guide the City's decisions for the next several years. A contract was approved in late 2018. This Plan is the outcome of that contract.



Other Plans Affecting Solid Waste

Climate Action Plan

In 2017, Mayor Turner made the commitment that Houston would adopt, honor, and uphold the goals of the Paris Climate Agreement. The Houston Climate Action Plan is designed to identify measures that can be adopted by the City to achieve these goals. The Integrated Resource Recovery Management Plan considers the material management recommendations developed for the City as part of the Climate Action Plan.



Disaster Debris Management Plan

The City of Houston Emergency Management Plan provides strategic guidance for City departments in the event of an emergency. The plan, which consists of a Basic Plan and functional annexes, is evaluated every five years on a rotating schedule. Annex W of the Emergency Management Plan is the Debris Management Plan. The City also maintains contracts for the management of disaster events and for the supplemental collection services that may be required during and immediately following a disaster event.

Houston Resiliency Plan

Resilient Houston is based on five themes that emerged from the “discovery areas” identified in the Resilience Assessment and used by Resilient Houston working group members to organize their approach to increasing resilience in Houston. These themes include the following:



- A Healthy Place to Live
- An Equitable and Inclusive City
- A Transformative Economy
- A Leader in Climate Adaptation
- A City That Grows Up, Not Out

Planning Process

Project Team Selection

In 2016, Mayor Turner recommended to the City Council that the City needed to evaluate the current solid waste management program and develop a long-term waste management plan. The Houston Solid Waste Management Department (SWMD) is the lead City agency responsible for managing the planning process. In late 2018, the City selected the consulting team of Arredondo, Zepeda & Brunz LLC, NewGen Strategies and Solutions, Risa Weinberger & Associates, Tetra Tech and EnFocus Strategies (the Project Team) to develop the Plan.

Plan Development

Development of a long-range plan required the following steps:

1. Examining the City’s current solid waste program;
2. Evaluating factors that could influence needs in the future;
3. Understanding the available, current resources for managing waste and recyclables;
4. Developing, with community input, goals and objectives for the future solid waste management program;
5. Identifying strategies that will move the City toward achieving stated goals and objectives;



- 6. Securing public input into the Plan’s preliminary approach; and
- 7. Finalizing the Plan and securing Mayor and City Council approval of the Plan.

Community Input

Mayor’s Advisory Task Force

To provide sufficient public input into the process, the Mayor formed the Mayor’s Advisory Task Force (MATF). The MATF is comprised of individuals representing neighborhood groups, academia, recycling interests, environmental groups, regional organizations and the solid waste industry. Members of the MATF included the following individuals.



MATF Task Force Members

Academic	Composting Industry	Non-Profit Organization
<i>Abate T. Wolde-Kirkos PhD</i>	<i>Lora Hinchcliff</i>	<i>Rachel Powers</i>
Apartment Industry	<i>Justin DuBose</i>	Recycling Industry
<i>Andy Teas</i>	Construction / Demolition	<i>Andrea Rodriguez</i>
Community Representatives	<i>Joe Rizzo</i>	Solid Waste Industry
<i>Becky Edmunson</i>	HARC	<i>Brandon Rogers</i>
<i>Jessica Hulsey</i>	<i>Andra Wilcox</i>	<i>Shanna Lopez</i>
<i>Allen Goodlow</i>	H-GAC	<i>Brett Sarver</i>
<i>Debbie White</i>	<i>Cheryl Mergo</i>	
<i>Rogene Calvert</i>		
<i>Vincent Sanders</i>		
<i>Amy Boyers</i>		

The MATF met at various times throughout the planning process. The input from the MATF has been extremely valuable to the development of this Plan. The MATF accomplished the following tasks:

- Developed goals and objectives;
- Assisted with the development of a public input survey;
- Provided input into community policies;
- Reviewed the findings of community input efforts including presentation at public meetings; and
- Reviewed and approved the draft and final Integrated Resource Recovery Management Plan.



Public Input

The SWMD anticipated implementing a number of in-person public meetings to gain input from the citizens regarding the direction of the Plan. However, Covid-19 has had an impact on the ability to hold large-scale public events. Four online public meetings, sponsored by SWMD, were held virtually to receive public feedback about the DRAFT Plan. These meetings were attended by between 25 and 50 people each.

The City published the DRAFT Plan on the SWMD website for Houston residents to review and provide comments. The SWMD used a variety of outreach methods and social media to encourage residents to review the DRAFT Plan and provide comments.

A survey was prepared by the SWMD, with the input from the MATF. The purpose of the survey was to identify waste management practices by Houston residents, understand their attitudes regarding potential service changes and their views on a solid waste management fee. The SWMD received over 1000 responses to the survey. The results of the survey are presented in Appendix E. In addition to responding to specific questions for the survey, a total of over 300 residents wrote specific comments that generally fit into the following categories.

- Need to increase public education and encourage greater recycling
- Concerns over a solid waste management fee and the impacts of a fee on lower income populations
- Support for a fee
- Specific concerns regarding the services being provided by SWMD
- Need to include more organics recovery
- Support for apartment recycling ordinances

Some of the key findings associated with the survey include the following.

- 93% of respondents believe that solid waste management is extremely or very important
- Almost all respondents identified actions that they do to reduce waste or recycle.
- Almost 70% of respondents' green carts are filled 80% or higher on the day of collection
- Approximately 40% of respondents' garbage carts are 80% full on collection day.
- 90% of respondents say they are either very confident or somewhat confident about what to put in their recycling cart, however, contamination is a big problem for the City's recycling program – between 30% and 40% of material collected is contaminated.
- 59% of respondents never place compostable bags at the curbside; 6% responded that they do this every week.
- The top three recommendations for increasing recycling included: require apartment owners to provide recycling; promote recycling at businesses; and place more recycling bins in public areas.
- 73% of respondents have used a SWMD drop-off facility and over 70% were very satisfied with the service.
- 45% agreed and 23% were neutral when asked if they support a fee to support a pay as you throw program that allows residents to be charged based on the size of collection cart they use.
- 48% agreed and 20% were neutral when asked if they support a fee to support expanded and improved services.
- In the comment section, several respondents believed they were already paying for solid waste services through their monthly water bill.

Input from other organizations

The [Houston Building Owners and Managers Association](#) requested information on the Clean City Fee and how the fee was to be collected. The City's fee structure and methods of collection will have to be determined at the time the fee is instituted and a clear definition of services to be funded under the fee are established.



Houston Apartment Association: “The report should clarify that the City will charge a Monthly Residential Fee and a Monthly Environmental Fee only to single-family households that receive solid waste collection service from the City. The City has never offered any solid waste or recycling service to multifamily residents, though multifamily residents are paying for these services through their taxes. The City should begin by offering recycling service to multifamily residents. If a voluntary program is successful, only then should the City consider a mandatory program. The City should begin by offering recycling service to businesses and institutions. If a voluntary program is successful, only then should the City consider a mandatory program.”

**Mr. Philip Salerno, Vice President & Treasurer, Forrest Lake Townhouse Association
President, Greater Inwood Super Neighborhood Council (SNC5)
Vice Chair, Super Neighborhood Alliance**

The following is a summary of Mr. Salerno’s comments. He commented that it should be clear that only residents receiving City solid waste collection services would pay the monthly service fee. This change was made to the Executive Summary. He applauded the recommendation that additional actions be taken to address the illegal dumping problem and that more resources do need to be dedicated to this issue and that SWMD must take responsibility for the timely clean-up of dumping on City streets and its right of ways. The Plan’s implementation needs to include representatives from the Super neighborhood Councils and the Super Neighborhood Alliance. He asked questions regarding how the Clean City Fee would be charged to multi-family sector. This will have to be determined when the fee is established. He opposes collecting the fee through the Water Department’s billing system. He has grave concerns about granting DON IPS further authority without providing the offender their day in court. “DON IPS already has issues relating to adjacent property owners, and frankly they are not neighborly and seem to escalate issues without any initial contact.” ...“There are no Key Performance Indicators (KPI) and no metrics identified. Those metrics can be supported by adopting SMART (Specific, Measurable, Achievable, Relevant, and Time-Bound) goals. I suggest that City and the SWD review the Lean Six Sigma method to assist in identifying the SLA(s), KPIs, and Metrics to demonstrate to the residents paying into the Fund (when, how, where, etc.) that the Fund will provide the trash services, improvements to the services, etc.” Mr. Salerno’s full comments can be found in Appendix E.

Second Servings - Barbara Bronstein

“I would like to see more emphasis on food recovery of surplus food from food businesses, which includes many more than “commercial restaurants” (which the Plan cites.) These include retailers, manufacturers, distributors, sports venues, convention centers, hotels, hospitals, business cafeterias, schools, etc. that have perfectly edible unsold and unserved food. Most restaurants produce small amounts of waste that is difficult to access because of their geographic dispersion, lack of storage capacity, and nighttime pickup requirements, when charity kitchens are closed. There is tremendous potential to expand food recovery throughout Houston and spare the landfill, by getting all major grocery retailers on board. Kroger, which has a “Zero Hunger, Zero Waste” campaign, recognizes its importance and is taking multiple steps to end waste, such as simplifying confusing package date labels and donating surplus food to nonprofits. The City can play an important role by encouraging the other major retailers to participate. Elevating the importance of food recovery in the City’s Plan can help drive support to fight hunger AND waste simultaneously.”

Ms. Bronstein’s full comments can be found in Appendix E.

Sarah P. Bernhardt, PhD., President & CEO Houston Bayou Preservation Association

“Consistent with the goals and objectives of the recently published draft Long-Range Solid Waste Management Plan which addresses Houston’s solid waste and recycling programs from now until 2040, we would like to see the amount of debris, litter and pollutants entering Houston’s waterways go to zero. While this is an impractical near-term expectation, we have developed considerable experience in understanding what drives the inflow of trash into local waterways and our organization contributes to waterway clean-up on an ongoing basis. In some cases, trash in one stream tends to accumulate when a tributary floods. In some cases, the local neighborhood is largely responsible for the issue. A granular



understanding of how the trash is delivered enables the design of a targeted and cost-effective remediation program. We stand ready to help the City of Houston design and implement the litter control, illegal dumping remediation and education programs that would have the greatest impact on cleaning up our bayou system.”

“Here are some of our preliminary ideas, none at this time developed to a level where we can provide a partnership proposal:

- 1) ...A granular understanding of how the trash is delivered to our waterways enables the design of the targeted and cost-effective remediation and education programs most likely to be effective long-term. Due to the known harmful downstream impacts of pollution on fragile marine ecosystems, it makes sense to prioritize remediating the illegally dumped trash which without near-term intervention will enter our waterways...
- 2) Monitoring the general health of our waterways needs to be done on an ongoing basis in order to get ahead and stay ahead of developing problems.”
- 3) Bayou Preservation Association has worked to build understanding of the relationship between littering on the land and trash in our bayous, and the harmful effects of that trash, through presentations, reports, workshops, signage, and participation in local events and workshops, to inform citizen groups, schools, and others. Perhaps some of this material could be leveraged to supplement other solid waste management educational materials which may be developed through this plan or perhaps there is a way for our organization to get involved in the implementation of educational programs yet to be developed. Leading school field trips related to these topics is a possible informational delivery option.”

M. Bernhardt’s full comments can e found in Appendix E.

Sara Tyler, Houston Clean City Commissioner - District G

“The Houston Solid Waste Management Department (SWMD) recently published a draft Long-Range Solid Waste Management Plan which addresses Houston’s solid waste and recycling programs from now until 2040. ...Given that this plan if adopted will provide the long-term framework that the City will use to make solid waste management decisions for the next two decades, including budgeting and rule-making, I encourage amendment of this plan as discussed below to ensure that the resulting program will remain fit for purpose, effective and cost efficient over the long term.”

“These comments present high-level suggestions along with their rationale. Adopting these recommendations would result in a plan and program that is more easily and transparently managed, provides greater opportunity for cost control, promotes continuous improvement and is more easily adapted to changing circumstances.

- Include program cost metrics as well as program performance metrics, include more performance metrics and standardize program reporting content and frequency
- Allocate environmental fee funding at the waste management stage first and at the program level second
- Right-size for service delivery - but also right-size service levels
- For fees implemented, ensure a high-level match between payee and beneficiary”

Ms. Tayler’s full letter can be found in Appendix E



2.0 Current Solid Waste Management Program

Key Points

1. The City relies on the General Fund to pay for solid waste management services. *The 2021 SWMD Budget is \$88.97 million. In comparison to other large-scale Texas cities, this amount is significantly less than what other cities spend per household for solid waste management services.*
2. The use of General Fund revenues is uncharacteristic of most large cities. *Most large-scale cities in Texas and across the country recover the cost of service through a user fee or a special assessment, funding an enterprise fund. For the four cities that were evaluated for comparison as part of this Plan, San Antonio, Dallas, Austin and Fort Worth, the range of monthly fees, including clean city fees, were \$22.75 (Fort Worth), \$27.26 (Dallas), \$29.00 (San Antonio) and \$50.80 (Austin).*

3. ***A comparison to other cities in Texas shows that Houston's staffing level is approximately ½ of what other communities have to provide similar services.*** The City's collection program is staffed at a rate of 908 households per employee compared to 400 to 500 households per employee in the four comparison cities identified above. This



places extreme stresses on the current staff and is a major contributor to the high rate of turnover in the Department. ***There is a significant need to right-size the Department for current and future services provided.***

4. ***The City's collection program relies on equipment that is in need of replacement.*** Approximately 50% of the trucks (side load, recycling and rear load) are over seven years old. Older trucks generally break down more often, require higher costs to maintain, and generate more emissions than newer trucks.
5. The City provides solid waste and recycling collection services to 390,786 households each week. In 2019, the City collected a total of 802,585 tons of MSW, bulky waste, recyclables and organics.
6. The City provides collection services to Houston residents designed to reduce the amounts of waste requiring disposal. These services include every other week collection of recyclable materials at the curb, operation of depositories and recycling centers, and the separate collection of yard waste and tree waste. Because 2018 included Hurricane Harvey, recycling efforts were curtailed for a portion of the year. In CY 2019, a total of 99,550 tons of recyclables, yard waste and wood were collected for recovery, or 12% of the waste collected.
7. The City's solid waste facilities include 6 depositories, 3 recycling centers, 2 environmental service centers, 4 service centers and 3 transfer stations. There are plans to design, permit and construct a 4th transfer station.
8. The City does not own a landfill and instead relies on contracts with private sector landfills.
9. The City provides for the collection of illegal dump sites. Both enforcement and resources available for cleaning up illegal dump sites are issues.



Summary of Services

The SWMD is primarily focused on providing service to single family households. Below is a summary of key services the City provides. Table 2-1 presents a summary of the collection services that are provided by the City, frequency of collection, and types of materials selected. Table 2-2 presents a summary of the tonnages collected from these various programs. The City's solid waste ordinance (Chapter 39 of the City Code) defines the services the City must provide as well as regulations related to solid waste management provided by both the public sector and the private sector.

Service	Frequency	Materials	Container
Residential Garbage	Weekly	Municipal Solid Waste	96-gallon carts
Yard Waste	Weekly	Grass clippings / leaves, brush	Compostable bags (not to exceed 50lbs) and small branches (less than 4' in length)
Residential Recyclables	Every two weeks	Paper and cardboard, glass, plastics #1-5 and 7, metals	96-gallon carts
Bulky ("junk") waste	Every other month	Junk Waste" is defined as items such as furniture, appliances, and other bulky material.	No more than 8 cubic yards may be placed at the curb at once
Tree waste	Every other month	"Tree Waste" is defined as "clean" wood waste such as tree limbs, branches, and stumps. Lumber, furniture, and treated wood are not accepted.	No more than 8 cubic yards may be placed at the curb at once
Dead animal collection	On-call service	For a fee, the City will collect large dead animals	NA
Neighborhood Depositories & Recycling Centers	Up to 4 times per month Hours of operation are Wed-Sunday 9:00 am – 6:00 pm (non-daylight savings time)	Junk waste, tree waste recyclables, used motor oil, and wood fencing	Vehicles larger than two tons and trailers longer than 16 feet are not permitted to use facilities.
Environmental Service Centers	South -Tuesdays and Wednesdays 9 am to 3 pm North - 2nd Thursday of each month 9 am – 3 pm	A variety of household hazardous wastes, batteries, paints and electronic wastes	There are specific limits on various materials that the City will accept.
Mobile Collection	Periodic collection dates throughout the City	Batteries, oil, paint, antifreeze, appliances and scrap metal	15-gallon limit on oil 15-gallon limit on paint 15-gallon limit on antifreeze

Other services provided by the SWMD include the following:

- Collection of illegally dumped waste tires. These tires are sent to tire processors;
- Collection of useable construction material at the City's Reuse Warehouse;
- Emergency response to disaster events such as Hurricane Harvey;
- Collection of waste disposed illegally at illegal dump sites throughout the City; and
- Participation in Keep Houston Beautiful events that are designed to collect litter and illegally dumped waste from communities.

Waste Stream	Tons
Municipal Solid Waste	433,851
Bulky Waste (junk waste)	269,183
Yard Waste	11,000
Tree Waste	37,360
Traditional Recyclables	51,191
Total	802,585



Multi-family and Non-Residential Waste Collection & Management

Multi-family and Non-residential waste accounts for approximately 82% of the waste generated in Houston. This includes waste from apartments, commercial establishments, and institutions such as schools, hospitals, and industries.

The City’s Solid Waste Ordinance (Chapter 39-98 – Duty of Property Owners for Collection) states that “Property owners shall ensure that solid waste collection services are provided on a regularly scheduled basis to collect all solid waste generated or accumulated on their property. Such schedule will be established to ensure that solid waste is collected at least one time per week or more frequently if required...” Waste generated by non-residential sources and multi-family residences are collected by the private sector and taken to one of the several facilities identified in this report for either recycling, processing, or disposal.

Businesses in the City are responsible for arranging for the collection and proper disposal of MSW. Typically, businesses contract with a private hauler to collect their waste, and recyclables if applicable. It is a competitive market. Rates for collection of materials from multi-family and non-residential sources in Houston are determined by the size of collection container and the frequency of collection.

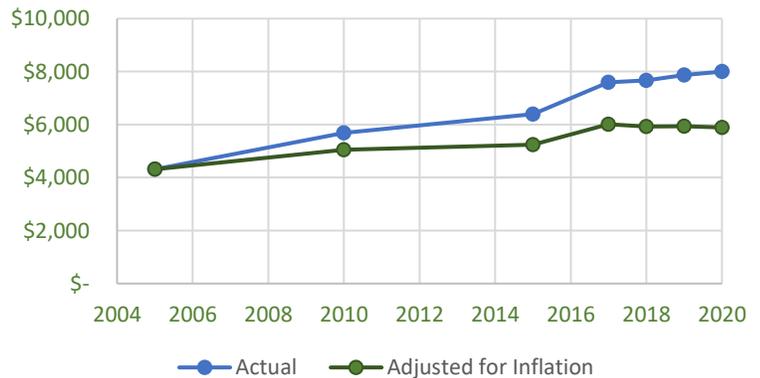
Private haulers providing services to businesses in the City must pay a franchise fee to the City. This franchise fee is to compensate the City for the cost associated with the haulers impacts to City streets and other City infrastructure. The fee is set at 4% of gross revenues from transporting commercial solid and industrial wastes that originate within the City limits. The estimated FY 2019 total solid waste franchise fees collected was \$8 million. Assuming a 4% rate, the total gross revenues generated by the 142 active solid waste haulers is \$200 million. In addition to the franchise fee, companies are required to secure annual dumpster permits that vary in proportion to the size of the containers.

Figure 2-2 illustrates the franchise fees that have been generated over the past several years. The figure illustrates that since FY 2005, the fees have increased by 85% in actual value from \$4.1 million to \$8.0 million in FY 2020. When adjusted for inflation, these revenues increased 36% from \$4.1 million to \$6.0 million. Based on a review of employment and inflation data over this timeframe, the data suggest that per employee generation rates for businesses and institutions

Figure 2-1
Sources of Waste (2019) -
Source: Waste Generation Report



Figure 2-2
Historic Solid Waste Franchise Fees (\$1,000)





during this period have increased, not decreased. Compliance with the franchise fee should be monitored to assure the City receives proper reimbursement.

Program Funding

The SWMD is funded through the General Fund. This is unlike most other large cities across the country who rely on a Monthly Residential Service Fee and in some cases a Clean City Fee to pay for the cost of solid waste management services. These cities established an Enterprise Fund to pay for the cost of collection, processing, and disposal. The use of an Enterprise Fund would allow the SWMD to function similar to a private enterprise. Clean City Fees are established to pay for services that do not benefit only single family residential households, including clean-up of illegal dump sites, construction and operation of regional depositories and recycling centers, and public information programs that address residential, commercial, multi-family and institutional sectors.

The SWMD FY 2021 budget is \$88.97 million. This budget supports the contracts for services, salaries and benefits associated with employees from the General Fund who are involved in SWMD community outreach efforts.

There is also a special revenue fund referred to as the "Recycling Revenue Fund" that was created to allocate dedicated funds to be used for the expansion and implementation of the City's Recycling Programs. The majority of these funds are used to pay for processing single stream recycled materials. Other programs include citywide tree waste recycling, additional neighborhood depository sites, and increased education and outreach. For FY 2021, the Recycling Revenue Fund amount is budgeted at \$4.9 million. The portion of the budget allocated for education is funded through the education contribution fee paid by the recyclable materials processor, per the processing contract. The Recycling Revenue Fund pays the salaries of 4 FTE positions to manage recycling contracts, education and outreach programs.

Table 2-3 presents the SWMD's budget from 2005 to 2020. The table shows that the SWMD's budget has increased from \$61.1 million in 2005 to a combined \$90 million in 2020 (including SWMD General Funds and Recycling Revenue Funds). Three factors have had an impact on the SWMD budget since 2005.

- Since 2005, the number of households has increased from approximately 288,000 to over 390,000.
- The cost of providing service over the 15 years is approximately 15% higher than 2005. **The budget per household has actually decreased from 2005** due to inflation and fuel price increases.
- The level of services provided since 2005 has increased significantly with the addition of single stream recycling, the addition of depositories and increased demands on the SWMD for storm debris management.

Enterprise Fund – A fund that is established for the sole purpose of providing a municipal service. The Houston Water Department is an example of a service funded through an Enterprise Fund.

Monthly Residential Service Fee – A fee that is charged to all residents receiving solid waste services such as weekly collection of garbage.

Monthly Clean City Fee – A fee that is charged monthly to all residents and businesses. For certain communities, the Clean City Fee is referred to as a Clean Community Fee or similar name that reflects the use of the funds. Clean City Fees are often designed to pay for those services that affect the entire City, such as clean-up of illegal dump sites and operation of depositories.



Table 2-3 SWMD Budget								
Year	2005	2010	2015	2016	2017	2018	2019	2020
SWMD Budget (\$ million)	\$61.1	\$71.7	\$73.7	\$76.6	\$83.7	\$80.5	\$87.7	\$93.1
Recycling Revenue Fund (\$ million)	NA	\$2.2	\$2.6	\$3.3	\$6.6	\$5.0	\$5.3	\$4.2
Total	\$61.1	\$73.9	\$76.1	\$79.9	\$90.5	\$85.5	\$92.8	\$97.3
FTE	NA	644	438	452	438	428	432	436

Texas Cities – Key Metrics

Table 2-4 provides a comparison of some of the key operational metrics for larger municipal solid waste utilities within Texas, including Houston. It is difficult to compare one municipal solid waste utility to another due to the various services provided, contracting out of certain services, etc. However, there are several factors that are worth noting in a review of the statistics.

- First, the City of Houston provides service to the largest number of households with the least number of employees. The City of Austin has 464 employees versus Houston with 437. Houston provides services to nearly double the number of households as the City of Austin (Austin does provide street and bike lane sweeping in its solid waste program). This has created the need for significant overtime expenses and employee stress.
- Secondly, the City of Houston’s per household budget is approximately 51% of the other cities. Regardless of the certain service differences, and frequency of services, etc., this calculation signifies a significant underfunding regarding the City of Houston and its Solid Waste Management Department versus its peer cities.

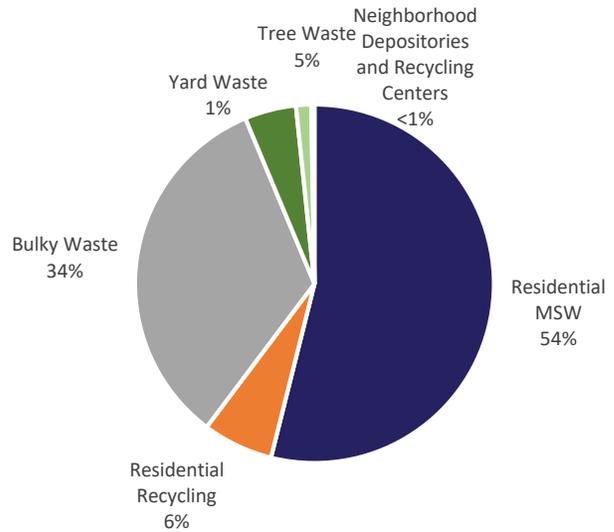
Table 2-4 Texas Cities – Key Metrics (
	Houston	San Antonio	Dallas	Fort Worth	Austin
Households Served	396,730	356,000	240,000	225,049	200,550
FTEs	437	619	619	116	464
Households Served per FTE	908	575	388	NA	432
Annual Budget (Millions)	\$92.8	\$145.0	\$113.8	\$67.7	\$97.1
Budget \$/Household	\$233	\$407	\$474	\$301	\$484
1. Does not include private haulers collecting waste 2. Houston’s budget includes General Fund and recycling reserve fund 3. Based on FY 2019 budget comparison					



Collection Program

The City is responsible for collecting approximately 802,585 tons of recyclables, organics and MSW from single-family residences per year. To provide these services, the City maintains a fleet of collection vehicles, three transfer stations, several depositories and recycling centers and environmental service centers. Figure 2-3 illustrates the distribution of materials collected by the City. The figure illustrates that approximately 12% is collected and sent to either FCC for recyclable material processing or to a Living Earth/LETCO facility for wood and yard waste processing into mulch or compost. Eighty-six percent of MSW and bulky waste is sent to one of the City's three transfer stations (a small amount is sent to private transfer stations). Twenty-five percent of the bulky waste and MSW is sent directly to one of four landfills without using a transfer station. The commercial sector, businesses and institutions including apartments, have the responsibility to provide for their own collection, recycling, and disposal services.

**Figure 2-3
Single-Family Residential Waste, Recyclables & Organics
Collection**



Collection Equipment

To collect waste and recyclable materials, the City operates and maintains a fleet of collection vehicles and other equipment. The City uses the same type of truck for the collection of solid waste as recycling.

Currently, the City is operating trucks that have been purchased between 2005 and 2019. Interviews with solid waste managers in other cities show that it is generally desired to maintain a solid waste fleet of vehicles which have the vehicles replaced on average after 7 years of use. A review of the City's collection fleet shows that over 50% of the City's operating collection fleet is over 7 years old. Figure 2-4 shows the distribution of truck purchases since 2005. Ideally, a fleet replacement program results in a consistent replacement of trucks over the years. If this had been done since 2005, the City would have replaced 16 to 18 trucks per year. This level of replacement can only be achieved in the future once the fleet has eliminated a large number of the older trucks. For the next five years, it will be necessary to replace between 30 and 40 trucks per year to get to a point where no trucks are more than 7 years old; then the City can start replacing 18-20 trucks per years on a "normal" rotation.





The number of collection vehicles purchased by the City varies from year to year, often determined by the City's fiscal condition. This has resulted in a series of years that experienced unfavorable budget conditions when few or no replacement trucks were purchased. In favorable economic times, the City has tried to catch up and purchase a large number of trucks in one year. For example, in 2007, a total of 68 trucks were purchased. This was also the year the City took back solid waste collection following managed competition. However, in 2013, 0 trucks were purchased for the Solid Waste Management Department. A preferred method is to have a consistent year-to-year program where older trucks are replaced with newer trucks annually. As of 2018, a total of 24 new trucks have been delivered. Another 31 trucks were purchased in 2019.

A consistent fleet placement program yields the following advantages:

- Lower annual capital outlays necessary for collection vehicles;
- Reduced maintenance costs associated with maintaining older trucks. A review of fleet operating costs shows that trucks older than 7 years cost approximately \$1 per mile (approximately 30%) more to maintain than trucks less than 7 years old. Total solid waste and recyclables collection miles driven by older trucks was 1.0 million miles of the total 2.6 million miles (does not include brush and bulky collections);
- Greater opportunities to take advantage of technological advances;
- Lower emissions from newer vehicles; and
- Availability of newer technologies.

Table 2-5 presents a comparison of San Antonio's fleet composition and age to Houston's fleet.

Table 2-5 Service & Fleet Comparison to San Antonio (FY 2019)		
Service	Houston	San Antonio
Residential Customers	390,786	356,000
Age of Residential Collection Fleet	Oldest operating trucks are 17 years old	Oldest operating trucks are 8 years old
Residential Services		
Residential Waste	Weekly	Weekly
Residential Recyclables	Bi-weekly	Bi-weekly
Residential Yard Waste	Weekly	Weekly
Residential Food Waste	Not provided	Weekly
Brush/Tree Waste	Bi-monthly	Semi-annually
Bulky Waste	Bi-monthly	Semi-annually
Number of Side Loaders	208 (42% are older than 7 years old)	185
Number of Rear Loaders	50 (90% are older than 7 years old)	49
Number of Grapple Trucks	42** (70% are over 7 years old)	44
Collection Rate (households / route)	1100	1250
Residential Collection Cost per Household	\$18.16 / month – based on City total solid waste budget / number of households	Variable Household Fee averaging \$27/month, not including Clean City fee.

Staffing

The City currently has an overall staff of 437 in the SWMD. Most of these staff provide collection services. Table 2-4 presented a comparison to other city solid waste staffing. On a per-household basis, Houston employees serve 937 households per Full Time Equivalent (FTE), while the average for San Antonio, Dallas and Austin is 456 households per FTE position. Fort Worth relies on private sector haulers, so its FTE positions do not provide a meaningful comparison. It should be noted that each city differs in the types of services provided; however, there is a clear difference in the level of staffing between these four cities. In 2019, the City budgeted for the equivalent of 38 FTE positions in overtime costs. The following are issues affecting full staffing:

Solid Waste Management

Is Hiring!

Solid Waste Management Department is looking for CDL drivers with a minimum of six (6) months driving experience.



- Non-Competitive salaries;
- Perceived working conditions in solid waste business; and
- Low unemployment (during development of the plan).

Increased Density and Its Impact on Collection Services

There is an increasing trend of converting neighborhoods that once were primarily single family households to higher density housing. This trend has created unique problems for Houston’s solid waste collection crews. The City’s guidelines require proper placement of collection containers to allow for efficient collection. However, due to the density of housing in certain neighborhoods, these requirements are not adhered to, causing problems for automated collection crews. Figure 2-5 illustrates how increased density has presented issues. In the future, the City will have to develop specific strategies for providing efficient collection services in these areas.

Sponsorships

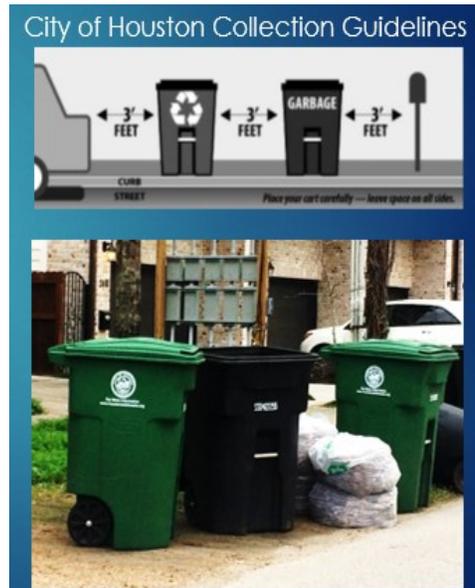
Section 39-64 of the City’s code of ordinances allows Homeowners Associations (HOA) and one civic association (CA) to arrange for their own solid waste management services and be reimbursed at a fixed rate by the City. “Sponsorship agreement means a reimbursement agreement between the City and an HOA or CA or other qualified entity for the purpose of partially offsetting the cost incurred by the association or qualifying entity in assuming the responsibility for all basic garbage collection service to residential units eligible for such service pursuant to Chapter 39 in certain defined areas of the city.” A total of 50,511 households are currently served through sponsorships in 164 HOAs or CAs.

HOA’s or CA’s with sponsorship programs act as independent entities and are responsible for the supervision and day-to-day administration of the collection service contracts. Private collection companies contract with the homeowners’ associations to provide service, and the City reimburses the associations for the cost of solid waste services provided, not to exceed an amount established by City Council. The communities served through homeowners’ associations are responsible for costs above the amount allocated by Council. Currently, the maximum amount reimbursable is \$6.00 per month per service unit authorized in the sponsorship agreement.

Curbside Recycling Program

The City provides residential curbside collection to 390,786 households within its service area, including weekly garbage collection, weekly yard waste collection, every other week recycling collection, and once per month tree waste/junk waste collection (in alternating months). These residential customers are provided with automated collection of garbage and single-stream (i.e. paper and containers comingled) collection of recyclables. Each residential customer is provided with a black 96-gallon roll cart for garbage and a green 96-gallon roll cart for recyclables collection. While the City has provided residential curbside recycling since the early 1990s, the transition to automated, single-stream recycling began in 2009.

**Figure 2-5
Container Placement**



If the City adopts a monthly solid waste management fee, new policies will have to be adopted regarding the City’s relationship with homeowners who live in sponsorship areas.





Recyclable materials included in the City's program ("program materials") include the following:

- Paper: Newspaper, magazines, catalogs, junk mail, office paper;
- Plastic: Containers No. 1 through 5, and 7; examples include water and soda bottles, milk jugs, yogurt cups, detergent bottles;
- Aluminum cans and foil;
- Steel and tin cans;
- Glass;
- Cardboard (flattened); and
- Cartons: gable top and shelf stable cartons, juice cartons, soup cartons, soymilk/alternative milk cartons.

As shown in Table 2-6, the curbside recycling rate has declined in recent years. It should be noted that glass was removed from the single-stream curbside recycling program in March of 2016 due to cost concerns, and glass drop-off locations were offered instead through a partnership with Strategic Materials Inc. Along with a new processing contract with FCC, glass was reinstated into the curbside program in April of 2019. In Fiscal Year 2018, the curbside collection programs for both recycling and yard waste were briefly suspended due to Hurricane Harvey, which may account for some of the decline in tons collected through curbside programs and, therefore, recycling and diversion rates in FY 2018.

Quantities projected for FY 2019 are anticipated to increase back to prior year levels.

The City collects recyclable materials once every two weeks as discussed in the recycling section of this report. Key issues related to recyclables collection include the following:

- High levels of contamination in the material;
- As participation rates in the recycling program increase, more trucks and staff must be directed to the recycling program. This could result in reductions in available MSW collection vehicles and staff.
- Distances that recyclables now must be hauled as the City relies completely on the FCC facility which is located in northeastern Houston; and
- In order to supplement City collection vehicles and crews, the City contracted for a private firm to provide recycling collection services in the northwest quadrant of the City. This is anticipated to be a short-term contract, with the City providing services as soon as fleet and staffing needs are addressed.

Recycling & the Circular Economy

“Looking beyond the current take-make-waste extractive industrial model, a circular economy aims to redefine growth, focusing on positive society-wide benefits. It entails gradually decoupling economic activity from the consumption of finite resources and designing waste out of the system. Underpinned by a transition to renewable energy sources, the circular model builds economic, natural, and social capital. It is based on three principles:

- **Design out waste and pollution**
- **Keep products and materials in use**
- **Regenerate natural systems”**

<https://www.ellenmacarthurfoundation.org/circular-economy/concept>



	FY 2016	FY 2017	FY 2018 ²
SF Curbside Recycling (Tons)	62,287	51,497 ¹	36,595
SF Yard & Wood Waste (Tons)	54,479	54,569	30,612
SF Bulky Waste (Tons)	287,064	174,742	195,829
SF Curbside Garbage (Tons)	385,660	431,717	445,397
Total Tons ³	789,490	712,525	708,433
Curbside Recycling Rate	7.89%	7.23%	5.17%
Curbside Yard & Wood Waste Diversion Rate	6.90%	7.66%	4.32%
Total Curbside Diversion Rate	14.79%	14.89%	9.49%

1. Glass was removed from the curbside recycling program in March of 2016.
2. The curbside collection program for recycling and yard waste was briefly suspended in FY 2018 after Hurricane Harvey.
3. This only includes tonnage collected by the City of Houston's Solid Waste Management Department.

All recyclables collected by the City are processed and marketed by FCC with whom the City recently signed a 20-year contract. The City owns the \$23 million plant under the contract, although FCC manages operations and maintenance. Curbside recyclables are delivered to the FCC MRF, which has an annual capacity of 145,000 tons.

Tree Waste and Bulky Waste Collection Service

Houston provides residents receiving City collection service with collection of both tree waste and junk waste. Collection of tree waste occurs in January, March, May, July, September, and November. Bulky waste is collected February, April, June, August, October, and December. The City maintains one fleet of trucks for collection and transport of both tree waste and bulky waste. Some of the same issues related to age of fleet are true for these trucks as well. The SWMD has tree grapple trucks that were purchased in 2001. The median age of the 42 tree grapple trucks is ten years. Table 2-7 shows the tons of tree waste and bulky waste collected in recent years.

Fiscal Year	Tree Waste Collected	Bulky Waste Collected
FY 16	38,611	287,064
FY 17	39,157	174,742
FY 18	22,215 *	195,829

* Tonnages affected by Hurricane Harvey

Collection of Waste During Storm Events

Hurricane Harvey had a significant impact on the City's solid waste management program. Since 2005, there have been an increasing number of storm events in the Gulf Coast area. Since 2000, there have been 9 major flooding events in Harris County.

In addition to expected major storm events, weather forecasters are projecting that Texas temperatures are going to climb in future years due to climate change. *"The U.S. government's National Climate Assessment recently warned that, by the late 21st century, temperatures in Texas could climb by more than 8 degrees, with an additional 30 to 60 days of 100-degree-plus temperatures and extreme heat that could result in hundreds of more heat-related deaths and greater risks to outdoor agricultural workers."* The significance of this to Houston's solid waste program is that as temperatures climb, safety of workers becomes increasing more challenging, while the likelihood increases that additional workers will be required to collect waste.

In 2017, the City of Houston experienced one of its greatest natural disasters in history. Hurricane Harvey brought unprecedented amounts of rain – 50 inches total. Some 208,000 homes were impacted, causing nearly \$16 billion in



residential damage within the city limits alone. It is estimated that City of Houston crews worked a total of 379,000 hours of (equivalent to 188 full time workers) to clear storm-related debris.

Hurricane Harvey Key Facts – Debris Removal

1. 575,000 tons of debris removed from Harvey-impacted neighborhoods
2. 67,600 truckloads of debris collected citywide
3. 21,000 tons of debris removed from Lake Houston
4. 379,000 hours worked by City employees on Harvey debris removal
5. 3 Mutual aid jurisdictions came to assist – City of San Antonio, City of Austin and TxDOT
6. Debris removal took 15 months
7. Estimated \$259 million for debris removal activities in Houston debris sites and landfills used for disposal

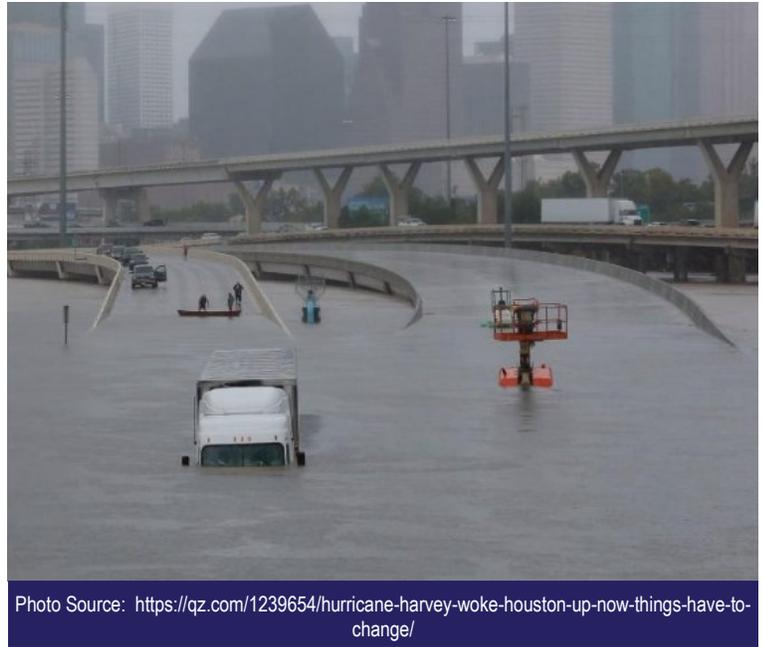


Photo Source: <https://qz.com/1239654/hurricane-harvey-woke-houston-up-now-things-have-to-change/>

https://www.houstontx.gov/postharvey/public/documents/11.28.2018_progress_report_updated.pdf

Multi-family service

The number of Houstonians living in multi-family households is anticipated to increase from 1.0 million in 2019 to 1.6 million in 2040. This means that by 2040, over half the population will live in multi-family households. Multi-family complexes are treated as a business, where the owner of the business is responsible for securing any solid waste or recycling collection services for residents. Waste projections from this sector are addressed in Part II, Section 3.0 of this Plan.

Only a small percentage of multi-family complexes have recycling services available to their residents. The City does maintain drop-off recycling centers to provide recycling services to residents of multi-family units, but residents must deliver their recyclables to the recycling centers. Therefore, locating future recycling centers or depositories should take into consideration the concentration of apartment complexes now and in the future. The need for additional drop-off centers could decrease if the City were to adopt a regulation that requires apartment owners to provide on-site recycling services to their tenants. Similar ordinances are either planned or adopted in San Antonio, Austin, and Dallas.

City Facilities

Transfer Stations

Table 2-8 presents a summary of the waste accepted by the City’s three transfer stations. The table shows the amounts of waste the City of Houston delivers to each transfer station (includes both MSW and bulky waste), the amount of waste delivered by Republic Services which is the operator of the transfer stations, and the amounts of waste delivered to the site by other “third party” haulers. A total of 57% of the waste delivered to the transfer stations is from City haulers. Each of the City’s transfer stations has a capacity of 2000 tons per day. In 2017, the average throughput was approximately 700 to 750 tons per day, assuming 310 days of operation per year.

Under the current contract for transfer station operations, the City is charged by Republic Services a fee of \$26.50 per ton, which includes acceptance of the waste and the haul and disposal of waste. Under the Republic Services agreement, if the City wants to direct haul waste to Republic Services’ McCarty Road Landfill, the fee is also \$26.50 per ton. Republic Services is authorized to accept waste from its own fleet as well as waste from outside its operations. In consideration of the fact that the City owns the facility, Republic Services is required to pay a “host fee” of \$2.00 per ton for all Republic



waste and \$3.00 per ton for all third party waste entering the facility. In 2017, Republic accepted a total of 232,653 tons of waste from its fleet and 67,663 tons from other sources. Total host fees generated in 2017 were approximately \$670,000.

Table 2-8 2017 City Transfer Stations – Throughput by Hauler Type (Tons)				
	City of Houston	Republic Services	All Other Privates	Total Tonnage
Houston Northwest TS	86,988	117,418	18,212	222,619
Houston Southeast TS	194,057	34,927	11,053	240,039
Houston Southwest TS	113,734	80,306	38,397	232,438
Total	394,779	232,653	67,663	695,096
% of Total	57%	33%	10%	100%

Aging Facilities

All three of the City’s transfer stations were registered with TCEQ in 1999. They have been in steady operation for over 18 years. These facilities also take on a considerable amount of structural stress as they accept a large number of heavy trucks per day and material is continuously pushed with large front-end loaders. In order to maintain the integrity of these facilities and allow for continued operation, the City will likely have to make periodic investments to upgrade the facilities, especially floors and roadways in and out.

The City had a study of the facilities conducted in 2012. The study evaluated the condition of the three transfer stations and made several recommendations on improving the sites. Some of these recommendations included the following:



- Roof repairs
- Overhead door replacement
- Repair concrete pavement
- Repair sprinklers, support beams
- Repair buildings
- Relocate electrical panel and conduit
- Repair/replace push walls to provide column protection
- Repair concrete ramps and guardrails
- Replace lighting fixtures
- Add armor plate to loadout chutes/hopper
- Increase building ceiling height in original building
- Expand building to add tipping floor and chute for recyclables

The estimated budget for these improvements is shown in Table 2-9.



Table 2-9 2012 Capital Improvement Recommendations for City Transfer Stations	
Transfer Station	Summary of Improvement Capital Costs
Houston Northwest TS	\$4,143,000
Houston Southeast TS	\$3,319,000
Houston Southwest TS	\$561,000
Total	\$8,023,000

Recyclable Material Long-Haul

Prior to the FCC contract for processing recyclable material, the City was using three different material recovery facilities. One of those facilities was the Waste Management Brittmore facility which is located in close proximity to the South Environmental Service Center. The City now must haul its recyclable materials from the southwest region of the City to the northeast region where FCC is located. Due to the configuration of the Southwest Transfer Station it is not practical to transfer recyclable materials from collection vehicles to long-haul vehicles there. This means that recyclable collection vehicles in the southwest quadrant have to haul their materials from the point of collection to the FCC facility, thereby requiring more collection vehicles for this part of town. The City owns the building for the Brittmore facility but has two years remaining on a lease of the building to Waste Management. Possible remedies are listed below.

1. Add more collection vehicles to the Southwestern region for collecting recyclables as it takes more time to haul materials from that location to FCC.
2. Convert the Brittmore facility, once the lease has expired, to a recyclable material transfer facility.
3. Construct a temporary transfer facility for recyclable materials at the South Environmental Service Center. Permitting may be an issue.
4. Identify a warehouse that could be utilized temporarily for transferring recyclable materials. Permitting may be an issue.

Neighborhood Depository/Recycling Centers

The City operates six neighborhood depositories that also collect recyclables, and three recycling centers to provide Houston residents a convenient opportunity to drop off junk, tree, and recyclable materials. City of Houston residents may use the facilities up to four times per month; however, contractors and commercial businesses are prohibited from using the facilities. Citizens are required to unload their own materials.

Accepted materials include:

- Junk waste: appliances, up to five tires, heavy trash, tree waste
- Aluminum and tin cans
- Household plastic containers No. 1 through 5, and 7
- Glass bottles and jars
- Paper
- Cardboard
- Used motor oil

Clothes and shoes are accepted at the North, Southeast, and Northeast Depositories. A list of all neighborhood depositories and recycling centers are listed in Table 2-10.



Table 2-10 Neighborhood Depositories and Recycling Centers	
Facility	Location
Neighborhood Depositories¹	
North	9003 N Main, 77002
Northwest	14400 Sommermeyer, 77041
Northeast	5565 Kirkpatrick, 77028
South	5100 Sunbeam, 77033
Southwest	10785 SW Freeway, 77074
Southeast	2240 Central Street, 77017
City Recycling Centers	
Westpark Recycling Center ²	5900 Westpark, 77057
Clear Lake/Ellington Airport ³	246 Loop Rd., 77034
Kingwood Recycling Center ⁴	3210 W Lake Houston Pkwy., 77339
1. Hours of Operation: 9 am – 6 pm, Wednesday – Sunday. 2. Hours of Operation: 8 am – 5 pm, Monday – Saturday 3. Open 7 days a week 4. Open on weekends only, Friday – Sunday	

Houston Depository / Recycling Facility Summaries

Table 2-11 provides a summary of the quantities of materials that are accepted at the City’s Environmental Service Centers, depositories, and recycling centers.

Table 2-11 Facility Collections (2017)	
Reuse Warehouse Donations	988,727 pounds
Chemical Swap Shop & Restore	313,854 pounds
ESC Electronics Reused/Recycled	60,855 pounds
Drop-off locations	3,332 tons

The Environmental Service Centers (ESC) provide drive-through drop-off locations for Houston residents to bring their household hazardous waste (HHW) such as anti-freeze, batteries, fuel, oil, paint, paint thinner, pesticides, herbicides, and household cleaners. Residential electronic scrap items are accepted (monitors, televisions, printers, keyboards, mice, scanners, fax machines, telephone handsets, VCRs, CPUs, cellular phones, and other small consumer electronics). These items should not be placed on the curb for collection with garbage or tree waste / junk waste pickup. Clean, white Styrofoam blocks (plastic #6) are also accepted at the ESC-South location; however, packing “peanuts” are not accepted.

The increased adoption and use of electronic products have led to a stream of new products with relatively short life spans. Electronic products are made from precious and special metals, including gold, silver, palladium, and platinum, as well as potentially toxic substances such as lead, mercury, cadmium, and beryllium. Therefore, responsible end-of-life management of e-waste is vital in order to recover valuable components and properly manage hazardous and toxic components. End-of-Life management of e-waste includes the reuse of functional electronics, refurbishment and repair of electronics, recovery of electronic components, recycling e-waste, and disposal.

The City’s curbside recycling collection service is limited to apartment communities containing eight or fewer units. For residents residing in multi-family complexes with greater than eight units, recycling services through the City are limited to use of the Neighborhood Depository/Recycling Centers described above (Table 2-10). Otherwise, multi-family complexes could contract directly with a private hauler for recycling collection. No data are available regarding the number of multi-family complexes that may contract with a private provider for recycling collection services.



Public Education & Information Program

The Solid Waste Department has a Public Information Officer to assist in promoting current programs and practices. There is also a Community Outreach Division with individuals who attend community events and communicate public services information on behalf of the Solid Waste Department, among other topics. Public Information Officers are tasked with promoting the neighborhood depositories and environmental service centers managed by the Solid Waste Department, providing general information to the public concerning trash and recycling. It should be noted that Solid Waste Management Department Public Information Officer and Community Outreach teams provide information to the public on all City solid waste services including disaster information; program changes; addressing illegal dumping concerns; litter abatement and regular collection schedule changes due to holiday or weather delays. These responsibilities are in addition to the following services provided by the SWMD.



The City's public information and community outreach program is also active within the City of Houston's Independent School District, and they host an annual "Growing Up Recycling" Cart decorating contest.

- Responding to requests for public information under Texas Public Information Act requests;
- Responding to requests for presentations and assistance to the Mayor's Office of Special Events for trash and recycling collection for things like 4th of July fireworks, the Houston marathon, and various parades; and
- Partnering with Keep Houston Beautiful on community clean-up efforts *There are currently no employees dedicated solely to recycling education.*

Funding for the City's Public Information Programs include private sector partners contributing to education. Specifically, Living Earth pays the City \$0.10 per bag of mulch sold, which contributes to recycling education. The FCC contract explicitly states that FCC will provide a financial contribution of \$100,000 per year to support education efforts to increase awareness about recycling in the City and will fund \$20,000 per year in educational programs operated by FCC. The SWMD has also been successful in securing grants from the Houston Galveston Area Council (H-GAC), which is a region-wide voluntary association of local governments in the 13-county Gulf Coast Planning region of Texas, and other agencies to sponsor public information and other waste minimization and recycling programs.

According to a U.S. Chamber of Commerce Foundation report, published in May 2018, cities should expect to spend about \$1 per household on educational campaigns, or \$3 to \$4 per household if the campaign addresses changes to an existing recycling program.¹ The Project Team researched the marketing/public outreach budgets for the following communities.

- Dallas, Texas: Based on their FY 2019 budget, transfer community outreach activities related to their Zero Waste program from Sanitation Services is budgeted at \$1,042,971. This amounts to approximately \$4.34 per household.
- Fort Worth, Texas: According to the City of Fort Worth's FY 2019 budget, the Solid Waste fund has 5 functional areas, one of which is community education which delivers public education and outreach. Although the budget did not indicate total costs associated with solid waste specific outreach, it is worth noting that the City also maintains a separate Community and Public Engagement Department that is tasked with public outreach on behalf of all City departments.
- Austin, Texas: Austin Resource Recovery Department maintains a Waste Diversion program for activities associated with strategic initiatives. The FY 2019 budget for their Waste Diversion program is budgeted at approximately \$2.5 million. This amounts to approximately \$12.38 per household.



Waste Minimization & Reuse Programs

In the full lifecycle of any product, there are three main segments: up-stream, mid-stream, and down-stream. The up-stream segment of a product's lifecycle involves the manufacturing process itself, where manufacturers determine which materials and how much material will be used to manufacture and package the product. The mid-stream segment of a product's lifecycle focuses on the longevity of the product, including reuse and repurposing of products. The down-stream segment of a product's lifecycle focuses on recovery, including recycling or energy recovery. By nature of the role of local government, the down-stream segment of a product's lifecycle is the point of greatest direct impact. However, local governments can, to some degree, influence the up-stream and mid-stream segments of a product's lifecycle, before the materials arrive at a local government facility, by promoting waste prevention, reduction, and reuse.



Reducing waste generation is by far the most environmentally beneficial action Houston residents and businesses can do to reduce environmental impacts. It is also by far the most cost-effective for the City. Waste that is not generated, does not have to be collected, processed, or disposed. For the commercial sector, waste minimization improves profit margins.

Grasscycling programs are one of the simplest ways to divert organic materials from the MSW stream. Grasscycling programs encourage residents to leave grass clippings on their lawns instead of bagging and disposing of them. Grasscycling diverts a portion of the waste stream and provides an excellent source of nutrients for the lawn. Yard waste makes up more than 30% of the total residential waste stream in Houston. Research has shown that lawns generate approximately 300 pounds of grass clippings per 1,000 square feet annually, which amounts to 6.5 tons per acre each year.¹

Green Building Resource Center

The GBRC offers over 50 educational displays, a library of information, samples of recycled materials for green building and in-home energy conservation and also highlights the impacts of recycling.

Building Materials Reuse Warehouse

The Building Materials Reuse Warehouse, located at 9003 North Main St., opened in April 2009 as a program of the City's SWMD. The Reuse Warehouse is funded in part by a waste reduction grant from the H-GAC. It benefits the community by providing space for excess building materials that would otherwise be disposed in local landfills, while also fostering a culture of reuse and expanding partnerships between community stakeholders. In 2018, the Reuse Warehouse collected a total of 998,000 pounds of bitumen, cardboard, ceramics, concrete, doors, glass, masonry, metals, wood, plastics, and other construction materials.

Chemical Swap Shop & ReStore

The City's Chemical Swap Shop and ReStore are operated by the SWMD and are located at the Environmental Service Center (ESC) South location. Every Friday, between 9 am and 12 pm, household chemicals and paint that were brought to the ESC South location for disposal but appear to be in good condition, are made available for citizen reuse. Citizens may take away these items at no charge; however, there is a limit of six chemical items and five gallons of paint per week. The ReStore serves as a book swap, a recycling information library, as well as a repository for craft items and post-consumer and post-industrial scrap; and also makes items available to the public during the Reuse Chemical Take-Away.

¹ <https://www.calrecycle.ca.gov/organics/grasscycling>



Recycling & Organics

Residential Yard Waste and Tree Waste Collection

The City collects yard waste (grass clippings, leaves, small branches) in City-approved compostable plastic bags, weekly. The City also collects large tree debris curbside in odd numbered months. Both services are provided to the single-family residents served by the SWMD. These materials are hauled to a private contractor for mulch and composting. The current vendor is Living Earth/LETCO, which has several compost and mulch processing facilities across Houston. In FY 2018, the City reported collecting approximately 9,397 tons of yard waste and 21,215 tons of tree waste from single-family residences. Table 2-12 provides green waste collected by the City in 2016-2018. FY 2018 quantities are about a 44% reduction from the previous year because the City discontinued green waste collection for most of the year in the aftermath of Hurricane Harvey. The 2018 data represent approximately 0.8 tons of yard waste and tree waste per single family household per year. The City Parks Department reported hauling 990 Tons of vegetative material from parks during the six months between December 2019 and May 2019, the only months for which data were collected. Yard waste and tree waste generated in the City in areas not served by City collection may be hauled by landscapers or contract haulers to landfills or compost/mulch facilities.

Table 2-12 Green Waste Collected by City of Houston (Tons)			
Year	Yard Waste	Tree Waste	Total
FY 2016	14,159	38,611	52,770
FY 2017	15,412	39,157	54,569
FY 2018	9,397	21,215	30,612
FY 2019	10,756	35,474	46,230
FY 2020	11,208	45,928	57,136

Neighborhood Depository Green Waste Drop-Off

Residents may drop off yard waste and tree waste at any of six neighborhood depositories.

Backyard Composting and Grasscycling

The City promotes on its website that residents may avoid the expense of compostable bags for grass clippings by practicing grasscycling. The City also supports a Master Composter Certification program which trains residents in proper backyard composting techniques and provides certification to those who complete the training and promote backyard composting in the community. In 2018 the City certified 13 Master Composters. The City also began selling backyard compost bins to residents in 2015.

Food Residual Recovery

The City does not provide the collection of either pre-consumer or post-consumer food residuals for recovery. It participated in a study of pre-consumer food residual collection through H-GAC and is supportive of efforts by H-GAC to facilitate food residuals collection for recovery. This program has not yet been fully implemented.

Biosolids Diversion

The City contracts with FCC Environmental Services to haul approximately 30% of its biosolids, or approximately 32,000 tons per year, to landfills for disposal. The remainder is processed into a fertilizer-like product by a private entity.



Overall Diversion Rate

Per the 2019 Waste Generation Report, total tonnage generated within the City was estimated using a combination of data sources provided by the City, as well as data from H-GAC. It is important to note that the total tonnage amount generated includes MSW, recycling, yard waste, and construction & demolition (C&D) tonnage. Based on the data summarized in 2019, the City has a total estimated diversion rate of approximately 32.4%. The diversion rate is significantly higher than the residential curbside diversion rate of 14.83% largely due to diversion of C&D waste, which is described in greater detail in Part II, Section 5.

Table 2-13 states the City's recycling rate with the recycling rates for other Texas cities, which was aggregated using FY 2019 budget information for the City and each of the benchmark communities. The City's residential sector generates comparable amounts of MSW compared to similar major cities. Table 6-13 provides a comparison of the tons of MSW, recyclables and brush/bulky waste collected by other cities.

- With the exception of Austin, Houston residents generate comparable amounts of MSW per household.
- The amount of material collected per household as part of the City's residential recycling program is lower than other cities. The City's recycling program was interrupted by Hurricane Harvey.
- Houston's budget per household for solid waste services is roughly half of the amounts budgeted by San Antonio, Dallas, and Austin. The levels of service may vary but, in general, the City's budget is significantly underfunded in comparison to these other cities.
- Houston also has approximately half the number of solid waste workers per household than the cities referenced above, with the exception of Fort Worth, which has a private firm provide collection services.

City	Houston	San Antonio ¹	Dallas	Fort Worth ³	Austin
Households Served	390,798	356,000	240,000	225,049	200,550
Annual MSW (Tons)	445,397 ²	384,000	246,000	247,333	128,829
Annual Bulky Waste (Tons)	195,800	32,574	132,000	22,600	11,179
Annual Recyclables (Tons)	36,595	61,186	57,600	42,978	48,080
Annual Organics (Tons)	69,769	135,629	40,000	37,778	42,825
Total Tons	747,561	613,389	475,600	350,689	230,913
Annual MSW/HH (pounds)	2263	2153.5	2044	2190	1277.5
Annual Bulky Waste/HH (pounds)	985.5	182.5	1095	219	109.5
Annual Recyclables / HH (pounds)	182.5	328.5	474.5	365	474.5
Annual Daily Organics/HH (pounds)	365	766.5	328.5	328.5	438
Total	3759.5	3431	3978.5	3102.5	2299.5
Annual Budget (\$ MM)	84.9	145	112.6	67.7	97.1
Annual Budget \$ / HH	214	407	469	301	484
1. San Antonio only provides 2 per year bulky waste collection service events 2. Bulky waste numbers for Houston reflect Hurricane Harvey impacts 3. Fort Worth relies on private sector collection contractor for residential collection					

Energy & Resource Recovery

Existing Program

There are technologies available to convert MSW to useful energy. The technologies used today are much more sophisticated in terms of environmental protection compared to incinerators of the past. Incineration of waste without



energy recovery was once a preferred method of significantly decreasing the volume of waste that requires disposal. In fact, there was an incinerator operating in Houston for solid waste management. This facility closed many years ago.

Many MSW landfills in the region convert landfill gas to energy. Landfill gas is generated as a result of decomposition of the organic portion of the waste in a landfill. Landfill gas is about half methane which can be used as a fuel, either directly or indirectly through the generation of electricity. Landfills in the state of Texas are required to have a landfill gas management plan that addresses how these gases will be managed. Landfills are also required to implement gas control measures as part of their operating plans. As presented in the Facilities Report, there are seven regional landfills with energy recovery programs shown in Table 2-14. Landfills that have landfill gas energy recovery systems include the following.

Facility	County	Gas Processed (million cubic ft.)	Gas Distributed Off-Site (million cubic ft.)	Power Generated and Sold (million kWh)	Power generated and used onsite (million kWh)
Security Landfill Gas to Energy Facility	Montgomery			22.4	22.7
Blue Ridge Landfill Gas Compressor Station	Brazoria	1,347	0	42.3	2.2
Fort Bend Landfill Gas Treatment Facility	Fort Bend	410	225	0	0
Coastal Plains Landfill Gas to Energy Facility	Galveston	0	0	25	26.7
McCarty Road Landfill Gas Recovery Facility	Harris	2,493	1,401		
Atascocita Landfill Gas to Energy Facility	Harris				
Ameresco McCarty Energy Landfill Gas to Energy Facility	Harris	1,045	1,045		
Total		5,295	2,671	89.7	51.6

There are alternative technologies to landfill disposal of waste. These options are at various stages of technological development and have varying environmental impacts and financial feasibility.

Disposal

In March 2020, the City signed two agreements for transfer station services and landfill disposal. Republic Services/BFI will provide operational management of the city's 3 transfer stations as well as landfill disposal of Type I (MSW) and Type IV (C&D material) solid waste. The landfills are McCarty Road in Northeast Houston; Blue Ridge Landfill in Fresno/South Houston on FM 521; and Whispering Pines Landfill in Northeast Houston (as necessary). Based on current routing and ease of disposal, Republic/BFI will receive about 90% of waste via transfer station or direct haul.

Waste Management will provide Type I and IV landfill and transfer station services at the following sites: Atascocita Landfill in Far North Houston near Kingwood; Hawthorne Park landfill in Northwest Houston on Tanner Road at Beltway 8; and the Koenig Street Waste Management Transfer Station in Pasadena, Texas. Based on current routing and ease of disposal, Waste Management will receive about 10% of waste via transfer station or direct haul.

Both contracts are for 5-year terms with one 5-year renewal for a 10-year potential total term (Table 2-15).

- The Waste Management contract is worth an estimated \$43 million for the 10-year term (10% of waste).
- The BFI/Republic contract is worth an estimated \$240 million for the 10-year term (90% of waste).



Table 2-15 Negotiated Landfill and Transfer Station Rates		
Sites Reported per day	Old Rate (per ton)	Negotiated Rate (per ton)
WM Landfill ATAS Comp	\$26.49	\$26.80
WM Transfer Station	-	\$34.50
COH Trans Stations Comp	\$26.47	\$25.11
BFI/RWS Landfills Comp	\$26.47	\$25.11

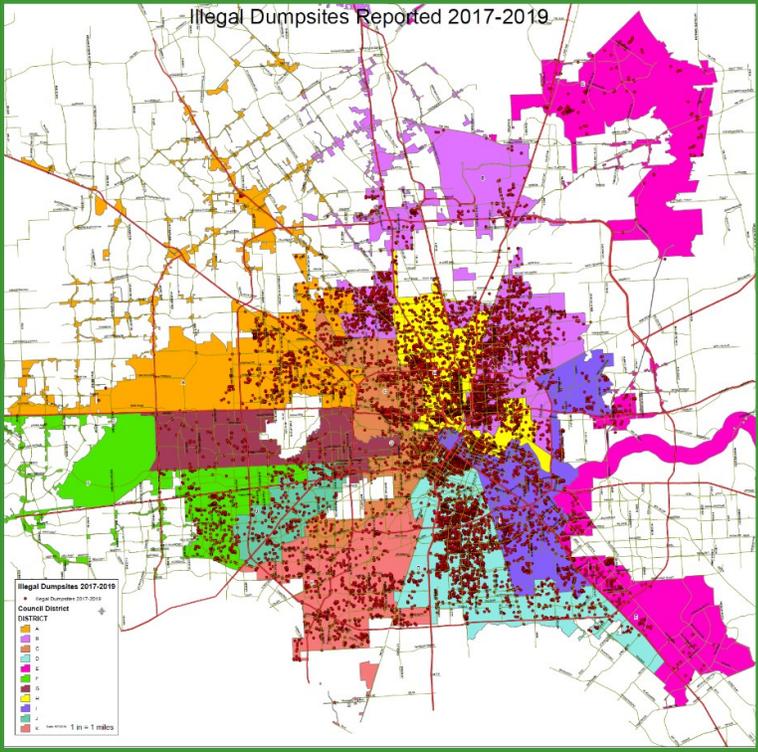
Illegal Dumping

Illegal dump sites are cleaned up by the junk waste collection crews which operate illegal dump clean-up activities only in odd-numbered months. The two agencies that cooperatively identify and report illegal dumping activity to the City for clean-up are the Department of Neighborhoods Inspection and Public Service Division and the Houston Police Department (HPD).

When the public calls the 311 call center to report illegal dump sites, the call center directs them to the Department of Neighborhoods. Illegal dump sites identified by the HPD are also forwarded to the Department of Neighborhoods. The Department of Neighborhoods refers the information collected by both agencies to the SWMD who cleans up the illegally dumped material. The Harris County Environmental Crimes Unit may also enforce Class B misdemeanors and above inside the City.

Figure 2-6 is a map prepared by Neighborhood Services of illegal dump sites reported between the beginning of 2017 and May 7, 2019. The SWMD removed 230 tons from illegal dumps reported to HPD from March 2018 through June 2019.

**Figure 2-6
Locations of Illegal Dump Sites
Reported 2017-May 7, 2019**



The HPD Environmental Investigation Unit may write citations or refer cases to municipal Court (<5 lb.) or the District Attorney (>5 lb.). Many illegal dumps occur on a resident's own property and are reported to Code Enforcement who issues a fine. Frequently, the resident then moves the material off of his or her property to another location where it is considered an illegal dump site. Illegally dumped wastes on vacant lots or other public areas attract more dumping at that location by additional violators.



The number of illegal dump sites within the City is high for several reasons.

1. Many residents do not know how to legally dispose of municipal solid waste either through the regular residential collection system or special collections for excess wastes, tree waste and heavy trash. In many cases this is due to the lack of appropriate public information reaching immigrants who come from cultures where wastes are handled differently, those who do not speak English and those who are illiterate in any language. It is not possible to provide public information regarding how to legally dispose of municipal solid waste using billboards because there is a City ordinance prohibiting the City from using billboards for any purpose.
2. Many residents are not able to access one of the six depositories during the four days per week that they are open. Some residents may be turned away for lack of proper documentation.
3. Enforcement mechanisms are slow, and cases are frequently dismissed in the Courts. When fines are issued by the courts, it is often long after the illegal dumping occurred. It is difficult to link cause (dumping) and effect (fines or imprisonment). Opportunities to issue immediate citations are limited.

Effective enforcement is lacking. When Class A and Class B misdemeanors are referred to the District Attorney, the City has typically cleaned up the dump site by the time the matter is seen by a judge. At that time, judges typically dismiss cases because the illegal dump site is no longer creating a public nuisance. Judges are more willing to issue fines for hazardous waste violations and dump truck tires than for dumping municipal solid waste. Although Code Enforcement can issue fines for code violations, they cannot issue fines for illegal dumping even though the responsible parties are often identified.

The HPD has Differential Response Teams who perform community policing using both traditional and non-traditional policing methods to address community crime. This team could get more involved in preventing illegal dumping. The HPD Community Liaison could also address illegal dumping; however, this position is currently vacant.

The HPD Environmental Investigation Unit manages and monitors cameras to identify environmental crimes. This program has been successful at identifying illegal dump sites and identifying responsible parties. They currently have 25 cameras but more cameras and staff to monitor them are needed. Instead, cases are currently referred to the District Attorney.

Table 2-16 Comparison of Illegal Dumping (Houston & Fort Worth)					
City	Sites Reported per day	Average Time to Clean Up	Dedicated Trucks	Enforcement	Fine
Houston	34	84 Days	0 (Tree Crews, only odd numbered months)	District Attorney for >5 lb.; JP or Muni Court for < 5 lb.	Typically, \$250 by D.A. for 1 st offence
Fort Worth	18	80% <48 working hours	5 (2-man crews)	Code Enforcement Officer Citation	\$554 for <1000 lb.

The Department of Neighborhoods database, as of May 7, 2019, included 17,283 illegal dump sites reported over a period of 508 days, averaging 34 reports per calendar day (some of which are duplicate reports). The sites that have been addressed and closed averaged 84 days from the date they were reported to the Department of Neighborhoods until they were cleaned up, or 54 days beyond the target of 30 days.



3.0 Houston Background

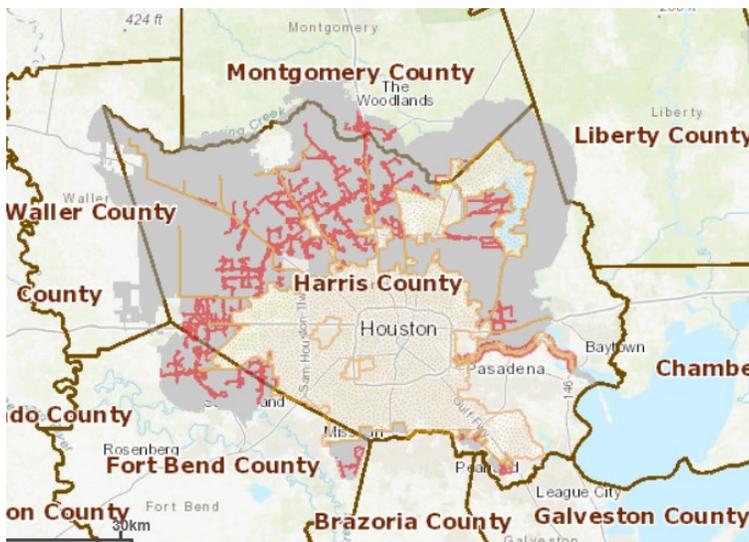
Background Key Points

- The City's boundaries incorporate a total area of 671 square miles, meaning the City's solid waste collection system provides service to an extremely broad service area.
- The City's land use is diverse, lacking major concentrated areas of residential housing; affecting the efficiency of waste collection.
- Houston's climate and weather conditions have had a dramatic impact on solid waste management resources in recent years – Hurricane Harvey generated approximately 1.1 million tons of disaster debris affecting regional landfill capacity and placing a significant strain on Houston's collection services.
- The City's transportation system is one of the most congested in the country. This increases the time required to haul waste from points of collection to either a transfer station or a landfill.
- Houston is the 4th largest City in the U.S., with a population of 2.38 million people. The City's population is anticipated to increase to 3.04 million by 2040.
- Housing trends show an increased percentage of Houston residents living in multi-family households versus single family households.
- Current employment is approximately 1.9 million and projected to increase to 2.4 million by 2040.

Geography & Land Use

Figure 3-1 City of Houston & Extra Territorial Jurisdiction

Source: City of Houston Planning & Development Department



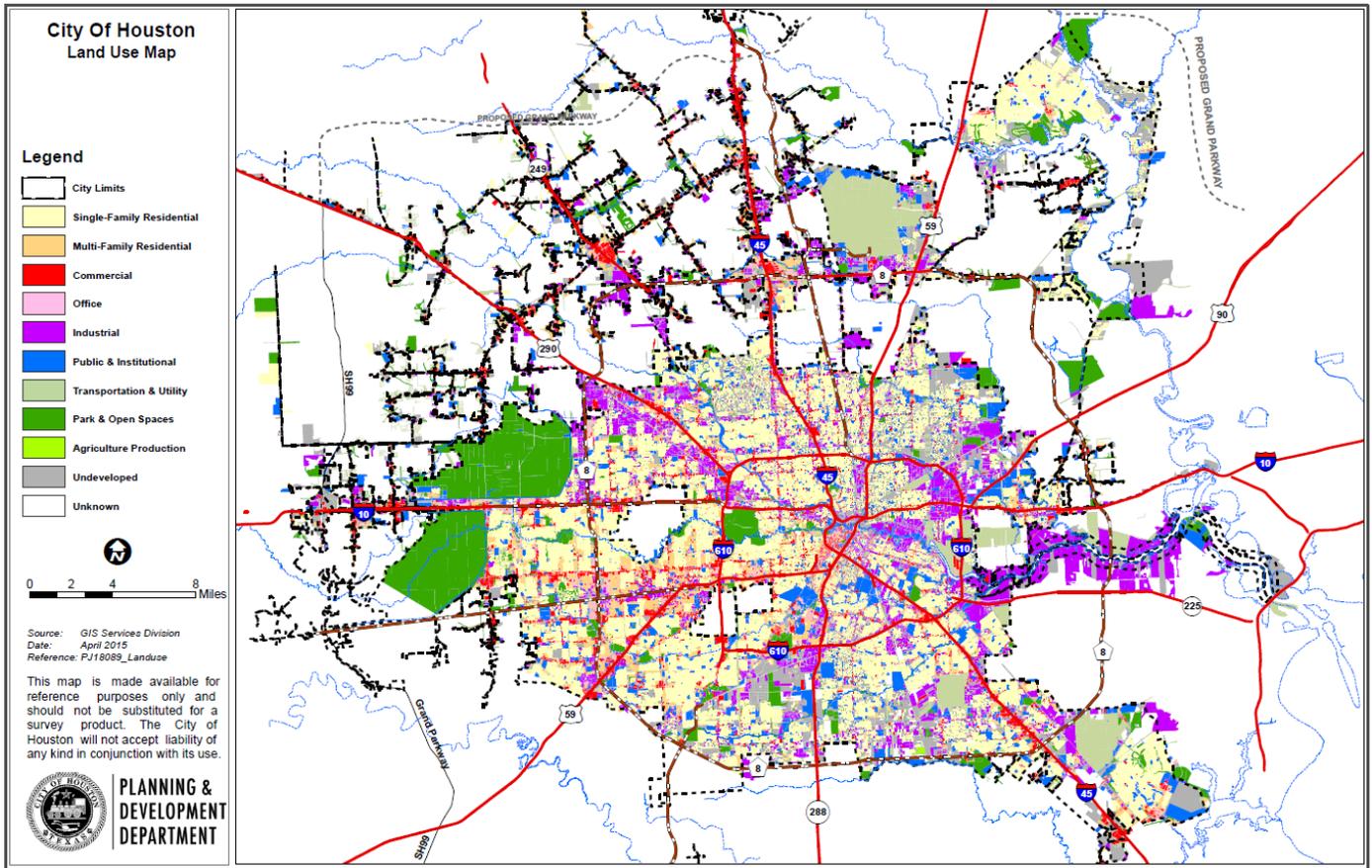
At 671 square miles, the City of Houston could contain the combined land area of the cities of New York, Washington DC, Boston, San Francisco, Seattle, Minneapolis, and Miami.

Houston is located on the Gulf Coast of Texas. The City's boundaries include a total area of 671 square miles. (Figure 3-1). This expansive area impacts the distances that solid waste collection crews must travel to collect waste and recycling and haul to either transfer stations, recycling facilities or landfills, and then return to their collection routes. Houston is primarily located in Harris County. Portions of the City are also located in Fort Bend and Montgomery Counties.

Houston's Land Use Map (Figure 3-2), prepared by Houston Planning and Development Department, illustrates a city that has a distribution of residential, commercial, institutional, and public spaces throughout the City. The lack of concentration of residential housing creates an additional strain on the City's collection program.



Figure 3-2 Houston Land Use Map



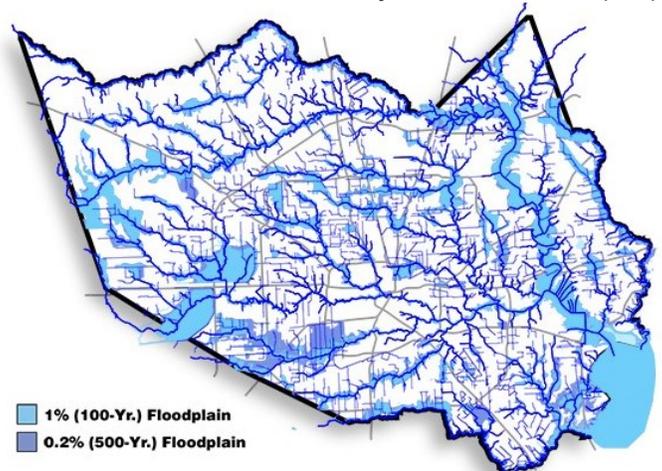
Source: City of Houston Planning & Development Department (2019)

Climate & Topography

The City's climate is predominantly marine. The terrain includes numerous small streams and bayous. Prevailing winds are from the southeast and south, except in January when frequent high pressure areas bring invasions of polar air and prevailing winds are from the north. (Source: Soil Survey of Harris County U.S. Department of Agriculture, 1996.)

"The Harris County Flood Control District's drainage and flood control infrastructure is extensive, including more than 1,500 channels totaling about 2,500 miles in length (about the distance from Los Angeles to New York). Nature also challenges us with flat terrain, clay soils that do not absorb water very well and an average annual rainfall of 48 inches. The flooding problems in the community are severe. Flooding is Harris County's most significant natural disaster. Several hundred thousand homes and businesses are in the identified floodplain (not all flooding areas are identified), and projects to reduce the risk of flooding are estimated to cost in the billions of dollars." (Source: Our Infrastructure & Area Challenges Harris County Flood Control District, 2019).

Figure 3-3 Harris County Floodplains
Source: Harris County Flood Control District (2019)





The City has experienced numerous severe storm events over the past several years, including the following. (Source: “Our Soaked History” Harris County Flood Control District, 2017)

Table 3-1 Major Houston Area Storms		
1990s	2000s	2010s
<p>1992 March- major storm floods more than 1,500 structures and many bayous are out of banks. Much of I-10 is underwater.</p>	<p>2001 June – Tropical Storm Allison strikes first on June 5, then returns three days later for a second round of storms. Texas Medical Center essentially shut down. North Downtown Houston decimated. Two million people impacted. 22 lives lost. More than 70,000 structures flood. Damages top \$5 billion.</p>	<p>2012 July – High water rescues along Cypress, Little Cypress and Willow Creeks after several days of heavy rainfall beginning July 9. More than 70 structures flood in northern Harris County.</p>
<p>1996 October – Major storm hits Harris County. Twice as many structures flood than in the 1992 storm. Most bayous are out of banks.</p>	<p>2006 June 19 – Rainfall on already saturated ground floods 3,370 homes 561 apartments and one nursing home. Mostly along Berry and Sims bayous. Rainfall 8-10 inches in three hours.</p>	<p>2014 August – Slow-moving rains drench portions of Harris County with 3.5-4.5 inches. In the Greens Bayou watershed 109 structures flood.</p>
<p>1998 September – Tropical Storm Frances causes extensive flooding along White Oak Bayou and other bayous. More than 1,300 structures flood.</p>	<p>2008 September Hurricane Ike, 3rd costliest in US history, strikes Galveston Island. Eleven deaths in Harris County. Storms surge swamps 2,500 structures; rainfall causes 1,200 more structures to flood. More than \$29 billion in damage</p>	<p>2015 May 25-27 – Memorial Day Flood. More than 6,000 structures flood. Seven fatalities. Highest rainfall recorded in Buffalo and Brays watersheds. Nearly 11 inches in 3 hours on Brays Bayou.</p>
<p>1998 October & November Adding insult to injury, two more major storms flood hundreds more structures damaged in Harris County.</p>	<p>2009 April 17-29 bring extensive flooding; five children drown when a car goes into a Greens Bayou tributary. Some highways close. Record high water on Bear, Langham, Mayde Creeks. 2,305 structures flood on Langham Creek and Buffalo Bayou.</p>	<p>2016 April 17-18 – Tax Day Flood. Historic flood over northern and western Harris county results in seven fatalities. Average 12-16 inches of rain in 12 hours county-wide – record pool levels in Addicks and Barker reservoirs. Estimated 9,820 structures flood in Harris County</p>
		<p>2016 May 25-26 Memorial Day Flood. North and northwest Harris County hit with 8-13 inches of rain. Overbanked and structural flooding on Cypress Creek and the San Jacinto River. More than 400 structures flood in Harris County.</p>
		<p>2017 August 23 – September 15 Hurricane Harvey. A category 5 Hurricane dumped 50 inches of rain on the City of Houston. Caused significant flooding throughout the City and was declared a national emergency.</p>

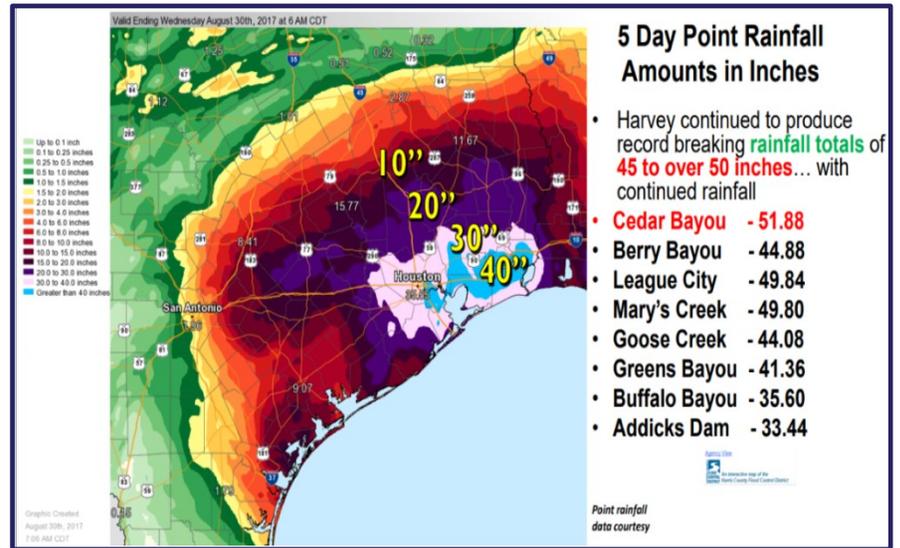


Hurricane Harvey

Hurricane Harvey impacted the Houston area between August 23 and September 15, 2017. The storm dumped approximately 50 inches of rain on the City of Houston and caused significant damage. The City is still recovering from this hurricane event. According to FEMA, the hurricane resulted in approximately 13 million cubic yards of debris over its entire area. In the H-GAC region, the impact on landfills was approximately 1.1 million tons of debris (10% of a year's total generation for the region).

Figure 3-4 Hurricane Harvey Rainfall

Source: National Weather Service (2019)



Transportation System

Roadways

There are over 16,000 lane-miles of streets in Houston that are the responsibility of the City's Public Works Department. The City's transportation system includes major highways including IH 45, IH 610, IH 10, IH 69/US 59 (Source: Urban Mobility Report Texas A&M Transportation Institute, 2019).

A recent Texas A&M study estimated that drivers in Houston spent 75 hours of delay time on Houston's roadways annually. These delays contribute significantly to the amount of time required to haul waste and resources from the point of collection to transfer stations, recycling facilities or landfills. Houston ranks 9th in the U.S. for delay time on roadways.

Truck Congestion Cost—The value of increased travel time and other operating costs of large trucks is estimated at \$52.14 per hour of truck time. The extra diesel consumed using state average cost per gallon associated with Houston is estimated to be \$548 million per year. As congestion increases, there will be a need for both additional routes and additional transfer stations within SWMD.



Congestion along Houston's roadways adds considerable time for the SWMD.





Figures 3-5 and 3-6 present the projected congestion maps as presented in the H-GAC 2045 Mobility Plan. The City's Extra Territorial Jurisdiction (ETJ), miles traveled are expected to increase by 84%.

Figure 3-5 2020 Congestion
Source: HGAC 2045 Regional Transportation Plan (2019)

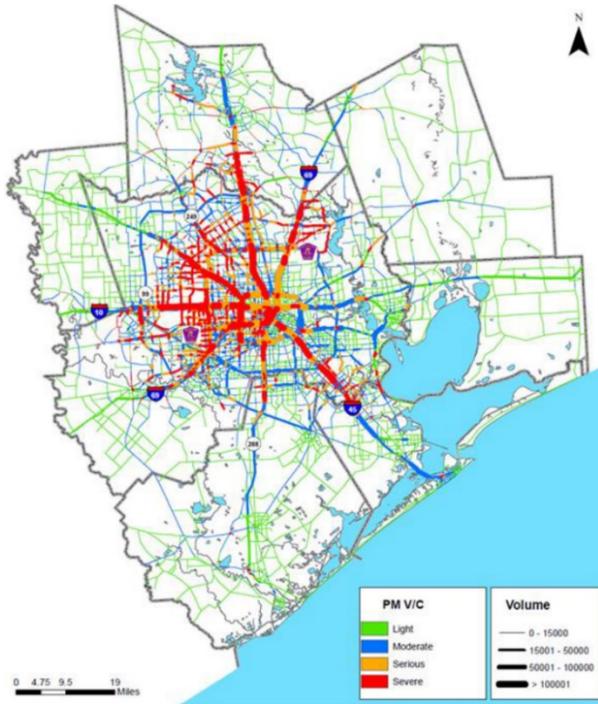
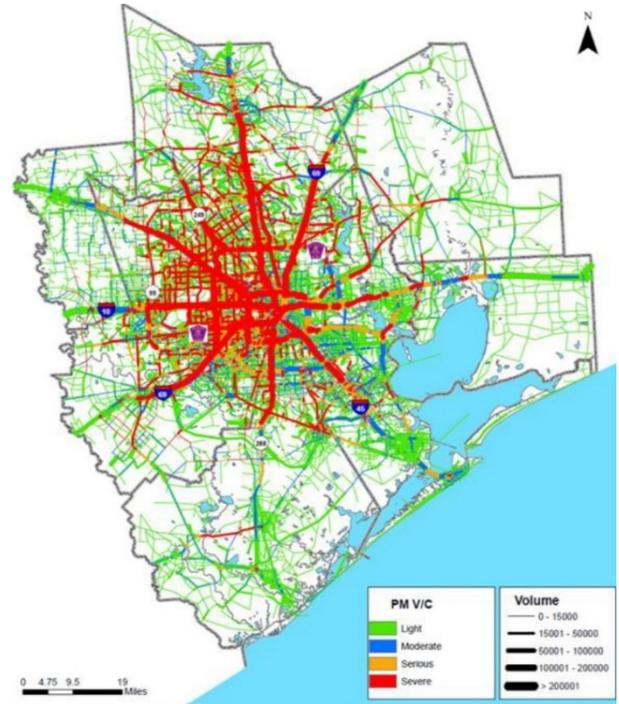


Figure 3-6 2045 Congestion
Source: HGAC 2045 Regional Transportation Plan (2019)



Rail Network

Houston is a Union Pacific Railway hub for six lines, linking the region with the Louisiana Gulf Coast, Midwest, West Coast, and Mexico. BNSF Railway primarily serves the north and east portions of Texas and connects them to the more northern Gulf ports, including Houston, Galveston, and Beaumont. The Kansas City Southern system has 908 miles of track operating in the state (including the Tex Mex, which KCS acquired in 2004), and is limited to other rail connections in Laredo, Corpus Christi, Houston, Dallas/Ft. Worth, and Beaumont. (Source: TxDOT)

Intermodal connectors link rail yards, seaports, airports, trucking and distribution facilities where the transfer of freight is completed on-site. Access to and from these intermodal facilities is along local roadways that connect to the state's highway freight corridors and serve as the last mile for freight movement. Freight intermodal connectors in Texas include 23 airport/truck, 39 port/truck, 18 truck/pipeline and 20 truck/rail connectors. Rail lines in Texas, together with trucking, support the intermodal freight transportation system for the state. Both UP and BNSF have rail lines located in the City of Houston. Intermodal facilities located in Houston are shown in Table 3-2.

Table 3-2
NHS Truck / Rail Intermodal Facilities (2013)

Facility	Connector Description
Empire Truck lines Container Yard, Houston	Wallisville Road (IH 610 to Oates)
Howard Industries, Inc.	Served by an existing NHS Route / Industrial Blvd
Maurice Pincoffs Co. Inc.,	Served by an existing NHS Route / Jacinto Port Blvd.
UP Settegast Yard	Kirkpatrick Blvd between the Terminal and I-610
UPS Sweetwater Lane Facility	2 Canino (IH 45 to Sweetwater Ln)

Source: 2016 Texas Rail Plan Update TXDOT

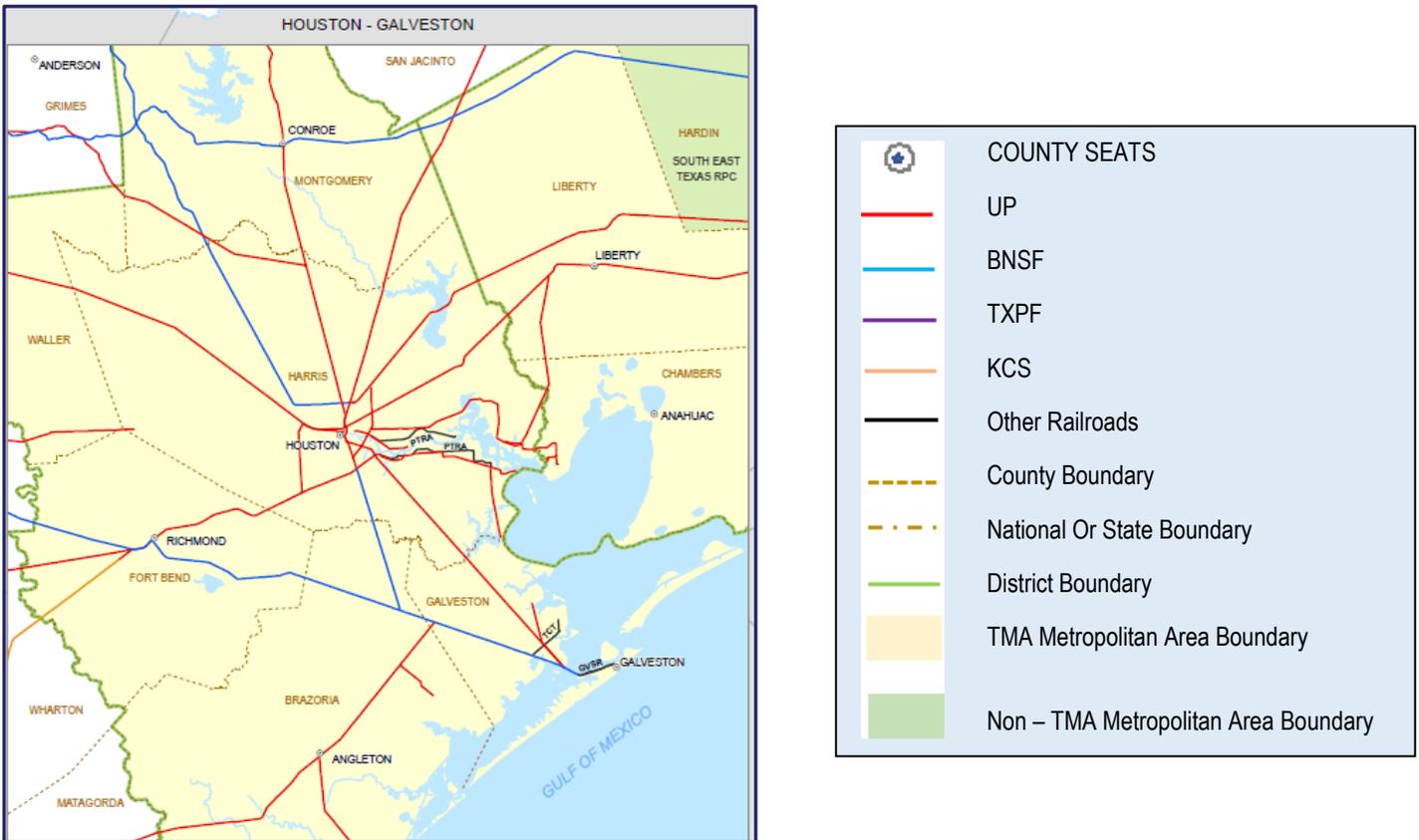


NHS – National Highway System

Figure 3-7 presents the Texas State Rail map for 2016. The map illustrates major freight lines located in the Houston-Galveston area.

Figure 3-7 Houston-Galveston Areas Rail Lines

Source: Texas State Road Map TxDOT (2019)



Houston Port

Houston is also home to The Houston Ship Channel, one of the nation's largest seaports which is experiencing tremendous growth. The Houston region is the country's number one region for exports and is home to the largest petrochemical manufacturing complex in the Americas. Energy production and the export of crude oil, along with the increasing global demand for chemicals produced in the region, are major drivers of the Port's success.

Largely because of petrochemical activity along the 52-mile ship channel, the nearly 200 private companies that make up the Greater Port of Houston have helped make the port the **No. 1 U.S. port in foreign waterborne tonnage**. Petroleum and petroleum products are leading import and export commodities.

More than 200 million short tons of international cargo were handled in 2018 alone. The economic impact of the Greater Port nationally includes **3.2 million jobs**, **\$801.9 billion in economic value** and more than **\$38.1 billion in tax revenue**. (Source: Port Houston) The activity at the Port represents a major source of waste, including special wastes that require special handling and disposal.



Demographics

Population

The City of Houston is the fourth largest city in the US. With a population of over 2.38 million people, the City has grown steadily over the past 60 years. In 1960, the City's population was 938,219. By 1990, the time when the last major solid waste management plan was completed for the City, the population was 1.63 million people. This growth rate has affected the amounts of waste generated in the City and the need for more waste and resource management infrastructure. The City's population is anticipated to continue to increase at a significant pace over the next 20 years. By 2040, the estimated population is anticipated to be 3.04 million.

Table 3-3 summarizes population projections for the City of Houston using H-GAC's forecast.



Figure 3-8 Houston Population Projections
Source: U.S. Census & H-GAC

Table 3-3 City of Houston Population Forecast						
	2019	2020	2025	2030	2035	2040
Population						
Single-Family	1,313,556	1,316,795	1,336,256	1,362,049	1,383,652	1,395,743
Multi-Family	1,070,119	1,090,697	1,199,631	1,326,114	1,503,522	1,649,287
Total Population	2,383,675	2,407,492	2,535,887	2,688,163	2,887,174	3,045,030

The compounded annual growth rates applied in each 5-year increment of the population forecast are noted below:

- 2015 – 2020: 1.00%
- 2020 – 2025: 1.04%
- 2025 – 2030: 1.17%
- 2030 – 2035: 1.44%
- 2035 – 2040: 1.07%

Households

H-GAC estimates the annual demand for housing units and non-residential space based on the forecasted change in the number of households and jobs. H-GAC also projects the future percentage of single-family and multi-family housing units (both current and future construction). For instance, the percentage of multi-family housing is projected to increase in future years, as a percentage of total housing units. Currently, the ratio between single-family (SF) and multi-family (MF) housing is approximately 1:1; however, H-GAC predicts that housing will reflect a SF:MF Ratio of 2:3 for the City of Houston by 2040. Table 3-4 summarizes household projections for the City of Houston using H-GAC's forecast.



Table 3-4 City of Houston Household Forecast						
	2019	2020	2025	2030	2035	2040
Households						
Single-Family	462,736	464,696	474,620	484,756	495,109	505,683
Multi-Family	478,538	488,601	540,884	599,117	682,942	758,524
Total Households	941,274	953,297	1,015,504	1,083,873	1,178,051	1,264,207

Source: H-GAC

The compounded annual growth rates applied for each 5-year increment of the total household forecast are noted below:

- 1 2015 – 2020: 1.28%
- 2 2020 – 2025: 1.27%
- 3 2025 – 2030: 1.31%
- 4 2030 – 2035: 1.68%
- 5 2035 – 2040: 1.42%

Employment

Table 3-5 summarizes employment projections for the City of Houston using H-GAC's forecast. Figure 3-9 illustrates the changing nature of employment from 2000 to 2017. H-GAC forecasts employment based on residential population, the unemployment rate, and a third parameter that controls labor force participation (i.e. age, disability, family responsibilities, etc.). In the base year of the forecast (2015), jobs were linked to specific locations (i.e. individual buildings) by matching companies and parcel addresses. H-GAC additionally utilizes a Real Estate Development Model to generate forecasts associating specific construction projects to specific parcels of land, given the physical availability of land, as well as the economic feasibility of each construction project in forecasting future employment.

Figure 3-9 Houston Employment Occupation
Source Houston Planning and Development Department (2017)



Table 3-5 City of Houston Employment Forecast						
	2019	2020	2025	2030	2035	2040
Employment	1,882,233	1,903,278	2,037,272	2,187,204	2,306,186	2,368,224

Source: H-GAC



The compounded annual growth rates applied for each 5-year increment of the employment forecast are noted below:

2015 – 2020: 1.12%

2030 – 2035: 1.07%

2020 – 2025: 1.37%

2035 – 2040: 0.53%

2025 – 2030: 1.43%



4.0 Waste Generation & Diversion Assessment

Key Points:

- 1 It is estimated that City-wide, **the recycling rate is approximately 32%** which includes private sector recycling activities, organics processing and construction/demolition waste recovery and recycling. The 32% is equal to approximately **2 million tons per year**.
- 2 The FY 2019 recovery rate for City residential programs is estimated to be 137,500 tons per year through single stream recycling, recycling centers and tree and yard waste collection and processing.
- 3 The City provides direct collection service to 390,786 residences. In 2019, the amount of waste collected was 643,000 tons, or 1,760 tons per day. This is equal to 8.9 pounds per household per day, or 1.6 tons per year.
- 4 Over 65% of the waste stream is generated by businesses and institutions, not including multi-family complexes.
- 5 Multi-family waste generation is equal to 626,600 tons per year. Housing patterns in Houston point to a greater percentage of individuals living in apartments and other multi-family dwellings in the near future.
- 6 In 2018, the City’s residents, businesses, and institutions, generated approximately 4.2 million tons of MSW that was disposed in landfills. This is equal to 11,500 tons per day.
- 7 Storm events such as Hurricane Harvey can have a significant impact on the quantities of waste generated in any given year. It is estimated that on a regional basis, Hurricane Harvey generated approximately 1.1 million tons of waste that went into regional landfills.

Disposal Forecast

As a starting point in the planning process, the Project Team evaluated the findings of the H-GAC 2017 Study – A Municipal Solid Waste Generation and Diversion Forecast for the H-GAC Region (“2017 H-GAC Study”). A portion of the City’s single-family household population is not currently served by SWMD. Approximately 84% of all single-family households located within the City of Houston are currently served by the SWMD. The remaining 16% are collected through subscription services. Waste generation tonnage (i.e. garbage, bulky waste, yard waste, and recycling) collected by the SWMD was provided for FY 2016 through FY 2018 and is summarized in Table 4-1.

	FY 2016²	FY 2017	FY 2018³
# of Single-Family (SF) Households Served	386,232	386,531	386,830
SF Garbage (tons/year)	385,660	431,717	445,397
SF Bulky Waste (tons/year)	287,064	174,742	195,829
SF Yard Waste (tons/year)	54,479	54,569	30,612
SF Recycling (tons/year)	62,287	51,497	36,595
Total	789,490	712,525	708,433

1. This is tonnage that is collected by the SWMD.
 2. FY 2016 metrics, from the 2017 H-GAC Study, concerning the number of single-family homes and curbside recycling tonnage were modified slightly based on more accurate data that were provided by the City as part of this report.
 3. The recycling and yard waste tonnage decreased in FY 2018 due to Hurricane Harvey and the City of Houston having to suspend these specific collection services for several months to focus on debris clean up.

Table 4-2 identifies the City’s single-family per-capita rates for both disposal and diversion. Due to slight differences in population and household forecasts between H-GAC’s current forecast and 2017 H-GAC Study, the FY 2016 per-capita calculations for the City are adjusted slightly downward from those noted in the 2017 H-GAC Study. It is also worthwhile



to note that after Hurricane Harvey impacted the City in August 2017 (FY 2018), the City of Houston's Solid Waste Management Department briefly suspended curbside collection of yard waste, and single-stream recycling. Therefore, the per capita metrics for FY 2018 were not representative of a typical year, and the per-capita ratios used to forecast waste disposal for FY 2019 – FY 2040 are based on the averages of FY 2016 and FY 2017.

Table 4-2 Single-Family Per-Capita Disposal and Diversion (Tons/Person)¹				
	FY 2016 Per Capita	FY 2017 Per Capita	FY 2018 Per Capita	Average per Capita²
SF Disposal				
SF Garbage	0.3540	0.3942	0.4049	0.3741
SF Bulky Waste	0.2635	0.1596	0.1780	0.2115
SF Disposal Sub Total	0.6175	0.5538	0.5829	0.5856
SF Diversion				
SF Recycling	0.0572	0.0470	0.0333	0.0521
SF Yard & Wood Waste	0.0500	0.0498	0.0278	0.0499
SF Diversion Sub Total	0.1072	0.0968	0.0611	0.1020
Total Generation	0.7247	0.6506	0.6440	0.6876

1. Example: 385,660 tons (Table 3-1, 2016, Single-Family MSW / 1,089,544 SF Population (Table 3-2) = 0.3540 tons per person per year
 2. The average per-capita generation rates used to forecast waste disposal in this analysis are based on the averages of FY 2016 & FY 2017.

Residential Disposal Forecast

The single-family waste disposal forecast for 2019 through 2040 is based on the calculated disposal rates and single family population forecasts. The per capita disposal rate is held constant for the entire forecast, which is a similar approach utilized in the 2017 H-GAC Study. Due to limitations in the availability of multi-family specific data, the same per-capita disposal rate for single-family and multi-family units were used. This is a conservative approach that is also consistent with the approach used in the 2017 H-GAC Study.

Table 4-3 summarizes the single-family and multi-family residential waste disposal for the City of Houston.

Table 4-3 City of Houston Residential Disposal Forecast (Tons)						
	2019	2020	2025	2030	2035	2040
Residential Disposal						
Single-Family	769,218	771,115	782,512	797,616	810,267	817,347
Multi-Family	626,662	638,712	702,504	776,572	880,462	965,823
Total Residential Disposal	1,395,880	1,409,827	1,485,016	1,574,188	1,690,729	1,783,170

Commercial Disposal Forecast

The commercial disposal forecast for the City of Houston is based on an average annual disposal rate of 1.51 tons per employee. This is then applied to the employment forecast. This metric was derived from the 2017 H-GAC Study and is consistent with other studies that evaluate disposal rates on a per-employee basis. The disposal rate was assumed to be constant for the entire 2019 through 2040 forecast. Table 4-4 summarizes the commercial disposal forecast for the City of Houston.



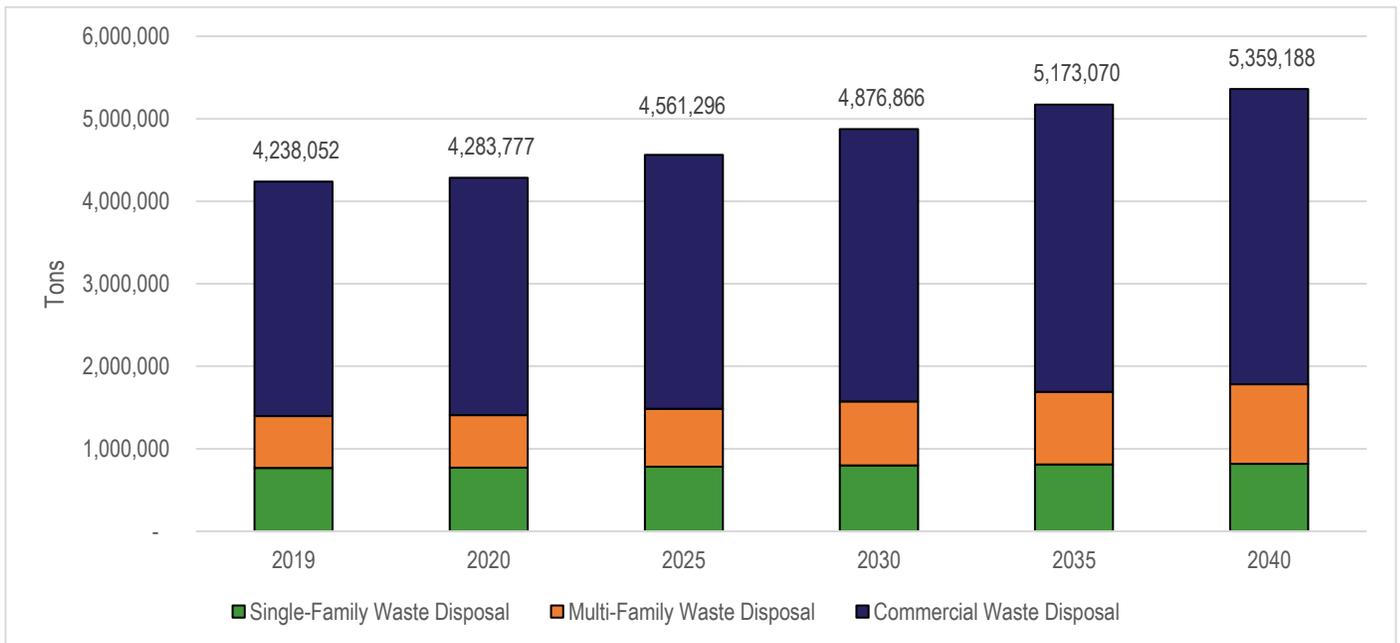
Table 4-4 City of Houston Commercial Disposal Forecast (Tons)						
	2019	2020	2025	2030	2035	2040
Commercial Disposal	2,842,172	2,873,950	3,076,281	3,302,678	3,482,341	3,576,018

Total Disposal Forecast

Table 4-5 and Figure 4-1 summarize the total disposal forecast, which is comprised of waste disposed by both the residential and commercial sectors.

Table 4-5 Forecast (Tons)						
	2019	2020	2025	2030	2035	2040
Residential Disposal						
Single-Family	769,218	771,115	782,512	797,616	810,267	817,347
Multi-Family	626,662	638,712	702,504	776,572	880,462	965,823
Commercial Disposal	2,842,172	2,873,950	3,076,281	3,302,678	3,482,341	3,576,018
Total Disposal	4,238,052	4,283,777	4,561,296	4,876,866	5,173,070	5,359,188

**Figure 4-1
City of Houston Total Disposal Forecast**





Diversion Forecast

City-wide Diversion Quantities

Estimated diversion efforts within the City are based on the quantities of yard and wood waste, recyclables, construction & demolition (C&D), and other recyclables diverted annually within the City of Houston.² The survey-based “Study on the Economic Impacts of Recycling” commissioned by Texas Commission on Environmental Quality (TCEQ) and released in 2017 (2017 TCEQ Study) was used to quantify the amount of these materials diverted. According to the 2017 TCEQ Study, approximately 9.17 million tons of material were diverted from landfills statewide in 2015. These 9.17 million tons are based on data collected through the 2017 TCEQ survey, as well as supplemental data received from other sources.

The data do not include the extrapolation of recyclables and is, therefore, a conservative estimate. Table 4-6 summarizes the diverted material per the results of the 2017 TCEQ Study.

Curbside and Drop-Off Recyclables

Approximately 8.17% of all Texas residents reside within the City of Houston. Therefore, it is assumed that 8.17% of all reported diverted material (approximately 749,328 tons of the 9,171,707 total tons) was generated within the City in 2015.³ Table 4-7 presents the quantities of materials recovered in Houston based on the 2017 TCEQ study. However, a review of Houston’s specific data shows significantly more C&D and organics being recovered.

The SWMD currently maintains metrics for their single-stream curbside recycling operation. Table 4-8 presents historic metrics for the residential recycling, yard waste, and tree waste.

	Total	% of Total
Typical Recyclable Material ¹	3,129,530	34.1%
Organics ²	2,747,128	30.0%
Construction & Demolition Material ³	3,136,727	34.2%
Other Recyclables ⁴	158,322	1.7%
Total	9,171,707	100%

1. Includes glass, metals, paper, and plastics.
2. Includes biosolids, food and beverage materials, yard trimmings, brush, and leaves.
3. Includes concrete aggregate and others.
4. Includes electronic materials, household hazardous waste, textiles, tires, and other uncategorized materials.

	Total	% of Total
Typical Recyclables ¹	255,683	34.1%
Organics ²	224,440	30.0%
Construction & Demolition Material ³	256,271	34.2%
Other Recyclables ⁴	12,935	1.7%
Total	749,328	100%

1. Includes glass, metals, paper, and plastics.
2. Includes biosolids, food and beverage materials, yard trimmings, brush, and leaves.
3. Includes concrete aggregate.
4. Includes electronic materials, household hazardous waste, textiles, tires, and other uncategorized materials.

² The amount of material estimated to be diverted includes both material collected by the City of Houston Solid Waste Management Department, as well as the private sector.

³ Per the U.S. Census (reported as of July 2017): 2,312,717 Houston population / 28,304,596 Texas population = 8.17%



In addition to single-family curbside recycling, the SWMD operates six neighborhood depositories/recycling centers and four neighborhood recycling drop-off locations. Tonnage collected at these ten sites are forecasted in Table 4-9. Private companies in the City also offer commercial recycling services, although the specific tonnages associated with commercial recycling collection are not publicly available. Table 4-10 and Figure 4-2 are based on the extrapolated metrics derived from the 2017 TCEQ Study and reflect the impact of the continued population growth within the City of Houston.

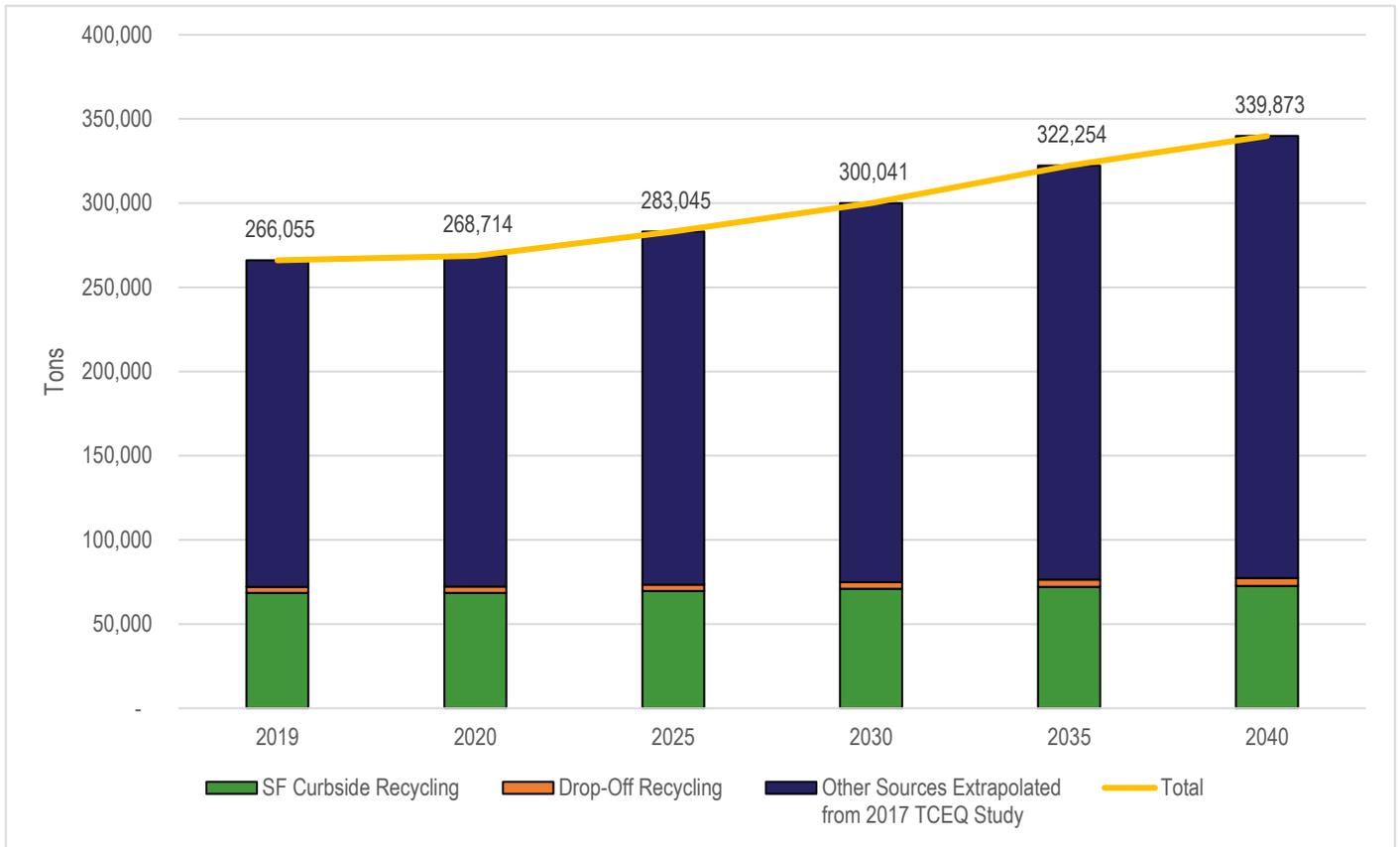
Table 4-8 Single Family (SF) Per-Capita Diversion (Tons/Person)			
	2016	2017	2018
SF Diversion			
SF Recycling	0.0572	0.0470	0.0333
SF Yard & Wood Waste	0.0500	0.0498	0.0278
SF Diversion Total	0.1072	0.0968	0.0611
Total Diversion (Tons/Year)			
SF Yard Waste (tons/year)	54,479	54,569	30,612
SF Recycling (tons/year)	62,287	51,497	36,595
SF Diversion Total	116,766	106,006	67,207

Table 4-9 City of Houston Typical Recyclable Material Forecast (Tons)						
	2019	2020	2025	2030	2035	2040
SF Curbside Recycling ¹	68,436 ¹	68,605	69,619	70,963	72,088	72,718
Drop-Off Recycling ²	3,567	3,603	3,795	4,023	4,321	4,557
Glass, Metals, Paper & Plastics Diversion from Other Sources ³	194,052	196,506	209,631	225,055	245,845	262,598
Total	266,055	268,714	283,045	300,041	322,254	339,873

1. Typical recyclables collected via curbside recycling for single-family units.
2. Tonnage sourced from the City of Houston depositories/recycling centers and drop-off locations.
3. Tons of recyclables from other sources is extrapolated per the 2017 TCEQ Study.
4. $0.0521 * 1,313,556$ (single-family population per Table 2-1) = 68,436 tons of single-family (SF) curbside recyclables.
5. This includes projected recycling tonnage for all single-family homes, both those collected by the City, and the 16% of single-family households collected by contracted service providers.



Figure 4-2
City of Houston Typical Recyclable Material Forecast



Organics

Table 4-10 summarizes the single-family yard and wood waste forecast for the SWMD curbside program, using the 0.0499 per capita rate identified in Table 4-2, and applying that rate to the estimated single-family population.

Table 4-10 City of Houston Single-Family (SF) Wood & Yard Waste (Tons)²						
	2019	2020	2025	2030	2035	2040
SF Wood & Yard Waste	65,546 ¹	65,708	66,679	67,966	69,044	69,648

1. $0.0499 * 1,313,556 = 65,546$ tons of single-family (SF) wood and yard waste.
 2. This includes projected wood and yard waste tonnage for all single-family homes, both those collected by the City, and the 16% of single-family households collected by contracted service providers.

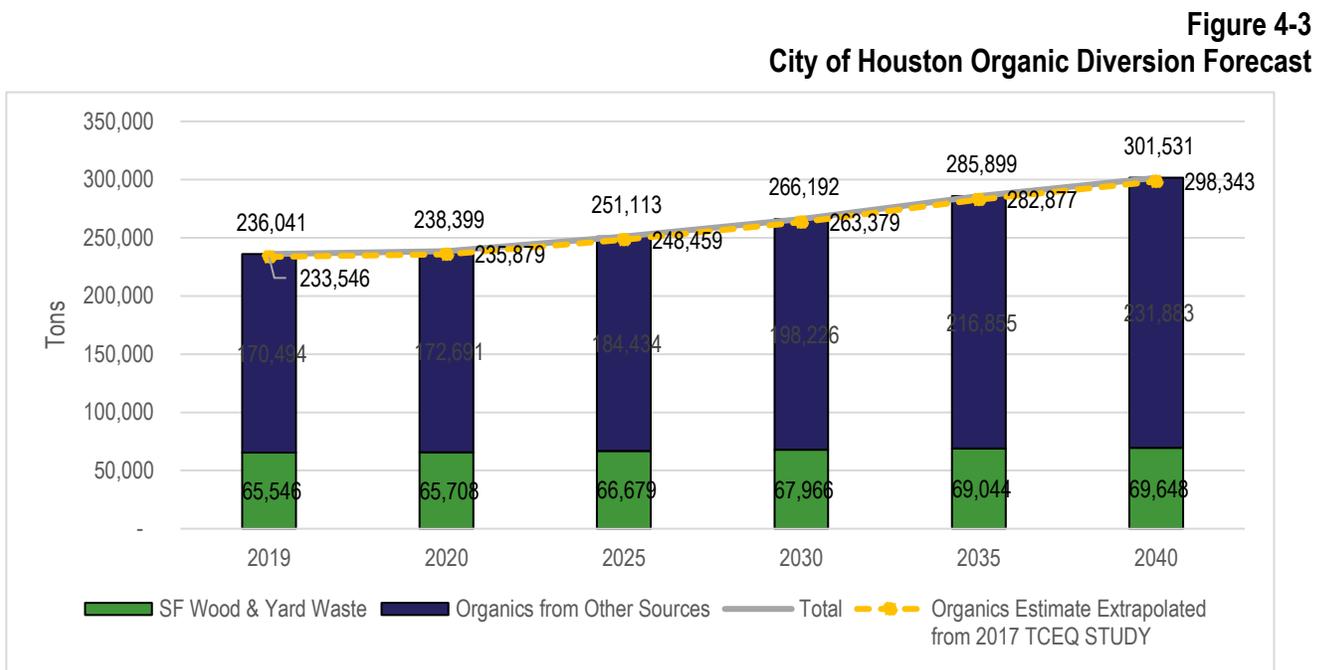
Table 4-11 summarizes the organics diversion forecast for the City of Houston and incorporates the impact of the continued population growth within the City.



Table 4-11 City of Houston Organics Diversion Forecast (Tons)						
	2019	2020	2025	2030	2035	2040
SF Wood & Yard Waste ¹	65,546	65,708	66,679	67,966	69,044	69,648
Organics Diverted from Other Sources ²	170,494	172,691	184,434	198,226	216,855	231,883
Total	236,041³	238,399	251,113	266,192	285,899	301,531

1. Yard waste and wood waste collected from single-family homes.
 2. Forecast for organics tracks with population growth. See Section 2.1.
 3. Values differ slightly from Table 4-5 because Table 4-7 was adjusted for growth. Table 4-5 was based on tonnage reported for 2018.

Figure 4-3 illustrates the organics diversion forecast for the City of Houston.

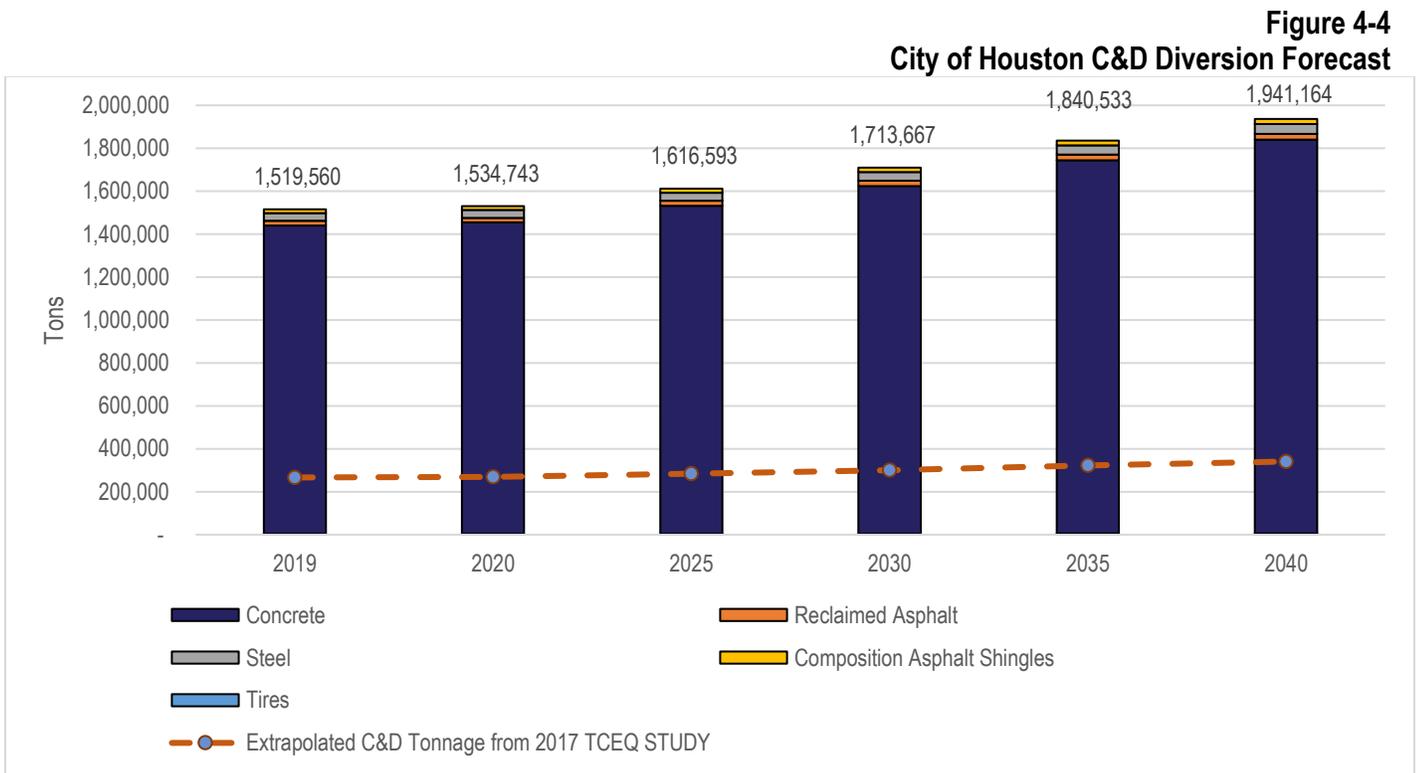




Construction & Demolition Materials

There are several demolition and C&D recycling companies that operate within the City of Houston. Based on conversations with some of these companies, it is estimated that approximately 1.5 million tons of C&D material is diverted on an annual basis from within the City of Houston. C&D material includes concrete (i.e. aggregate), reclaimed asphalt, steel, composition asphalt shingles, and tires.⁴ Table 4-12 and Figure 4-4 summarize the C&D diversion forecast, which is projected to increase with population growth.

Table 4-12 City of Houston Construction & Demolition Materials Diversion (Tons)						
	2019	2020	2025	2030	2035	2040
C&D Materials	1,519,560	1,534,743	1,616,593	1,713,667	1,840,533	1,941,164



Other Recyclables

It is interesting to note that the amount of C&D being diverted within the City of Houston (1,519,560 tons) is significantly greater than the amount estimated per the 2017 TCEQ Study 256,271 tons. This is due to the very active C&D diversion program within the City of Houston and this Region by several C&D contractors within the Houston area, most notably Cherry Companies.

The final component of the waste diversion forecast includes other recyclables which combine for a small percentage (1.7%) of all diverted materials. These materials include electronic waste, household hazardous materials, textiles, tires, and other uncategorized materials.

⁴ The following additional material could be diverted if markets for them are established: sheet rock, carpet, treated wood, gypsum, and glass.



Table 4-13 summarizes the forecast for these types of materials, which is based on the 8.17% allocation factor (Houston residents as a percentage of the State of Texas population). These generation rates are assumed to grow at the same annual growth rates as population.

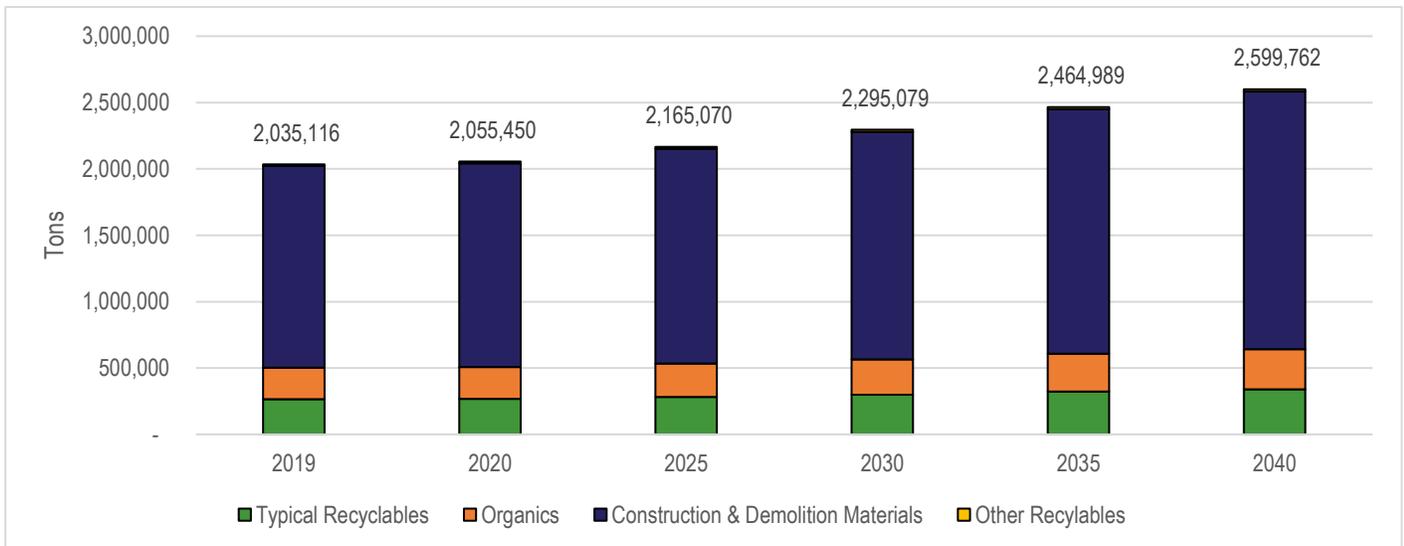
Table 4-13 City of Houston Other Recyclables (Tons)						
	2019	2020	2025	2030	2035	2040
Other Recyclables	13,460	13,594	14,319	15,179	16,303	17,194

Total Diversion Forecast

Table 4-14 and Figure 4-5 summarize the total diversion forecast, which includes the following materials: typical recyclables, organics, C&D waste, and other recyclables.

Table 4-14 City of Houston Total Diversion Forecast (Tons)						
	2019	2020	2025	2030	2035	2040
Typical Recyclables	266,055	268,714	283,045	300,041	322,254	339,873
Organics	236,041	238,399	251,113	266,192	285,899	301,531
Construction & Demolition Waste	1,519,560	1,534,743	1,616,593	1,713,667	1,840,533	1,941,164
Other Recyclables	13,460	13,594	14,319	15,179	16,303	17,194
Total Diversion Tonnage	2,035,116	2,055,450	2,165,070	2,295,079	2,464,989	2,599,762

**Figure 4-5
City of Houston Total Diversion Forecast**



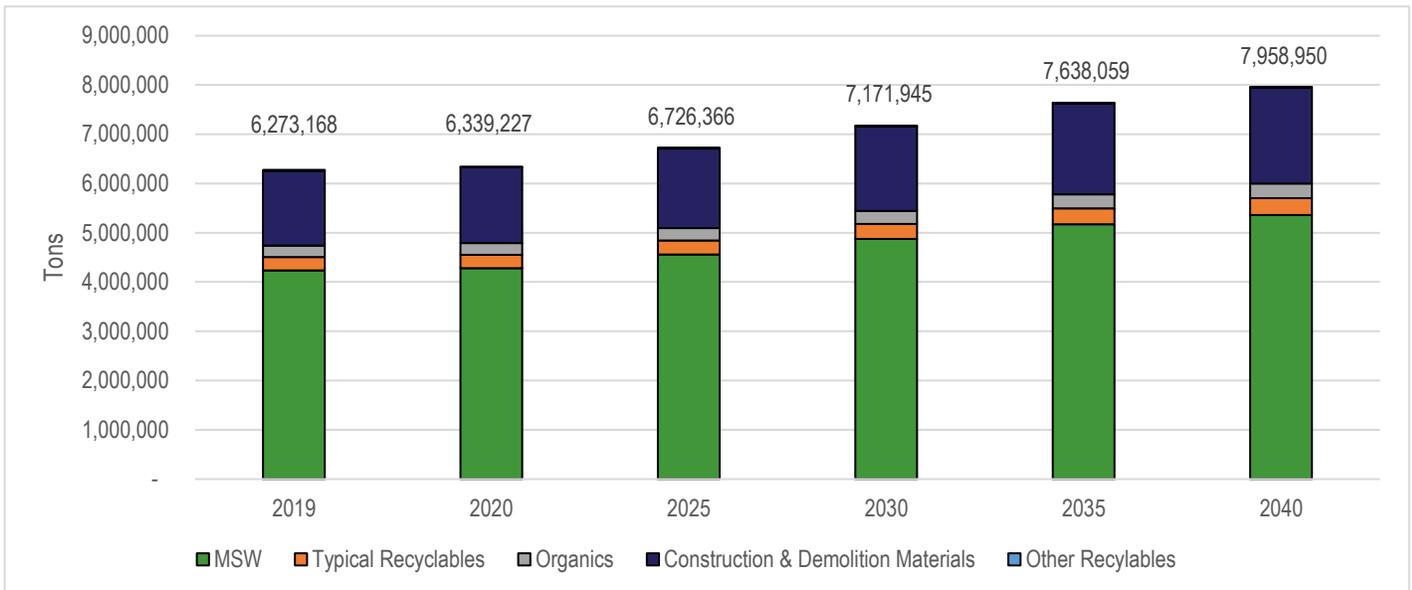


Forecast Summary

The total generation forecast is comprised of both the disposal and diversion forecasts. Table 4-15 and Figure 4-6 summarize the generation forecast. Based on the data as shown in Table 4-15, the City has an estimated diversion rate of approximately 32.4%. However, it should be noted that 75% of the diversion rate is due to C&D. Excluding C&D, the diversion rate is approximately 10.9% ($515,556 \text{ tons} / (4,238,054 + 515,556) = 10.9\%$). Based on this analysis, while a significant portion of the waste stream generated within the City of Houston is diverted, there are additional opportunities to increase the diversion of materials from landfills within the City of Houston in a cost-effective manner.

Table 4-15 City of Houston Total Generation Forecast (Tons)						
	2019	2020	2025	2030	2035	2040
Total Disposal	4,238,052	4,283,777	4,561,296	4,876,866	5,173,070	5,359,188
Total Diversion	2,035,116	2,055,450	2,165,070	2,295,079	2,464,989	2,599,762
Total Generation	6,273,168	6,339,227	6,726,366	7,171,945	7,638,059	7,958,950

Figure 4-6
City of Houston Total Generation Forecast by Type of Material





5.0 Facilities Assessment

Key Findings

1. Management of municipal solid waste requires a complex infrastructure, including facilities to collect, process, recover, transfer, and dispose of wastes.
2. The City relies on facilities throughout the region to meet its needs. Based on TCEQ reports, all of the MSW landfills in the H-GAC region report they accept waste generated in Harris County. Waste is also imported from other counties to the McCarty Road Landfill located in Houston.
3. The private sector has a critical role in meeting Houston's municipal solid waste management needs. This includes hundreds of recycling businesses as well as material recovery facilities, mulch and composting operations, transfer stations and landfills. This fact has both benefits and risks to the City that were evaluated in the planning process.
4. Currently, the City relies primarily on the McCarty Road, Blue Ridge or Atascocita Landfills for disposal of waste collected by City crews, which is primarily residential waste. These landfills have a combined capacity of 140.2 million tons of waste, or approximately 37 years at current rates of disposal. **The McCarty Road Landfill has 13 to 16 years of remaining capacity and the Atascocita Landfill has 24 years of remaining capacity** (Source: TCEQ MSW Landfill Annual Reports). It generally takes between **10 to 15 years to secure new capacity in Texas** under today's political and regulatory climate. There is a total of 13 operating municipal solid waste landfills in the H-GAC region with a combined remaining capacity of between 30 to 40 years assuming current per-capita disposal rates.
5. A total of 2.8 million tons of C&D waste is disposed at the 15 operating Type IV C&D landfills in the region. Regionally, these facilities have an estimated 20 to 30 years of remaining capacity.
6. **In 2010, 7.2 million tons of waste were landfilled in the H-GAC region; in 2018, 9.9 million tons were landfilled** (Source: TCEQ Annual Municipal Solid Waste Report & Landfill Annual Reports to TCEQ). This increase is largely attributed to increases in population and economic activity. Also, tonnages associated with Hurricane Harvey are reflected in the fiscal year 2018 figures, explaining the increase in C&D disposal quantities from 1.8 million tons to 2.8 million tons. **Regionally, the per-capita disposal rate for MSW increased from a rate of 5.22 pounds per capita per day (pcd) in 2010 to 5.52 pcd in 2018.** In 2040, the estimated regional population is projected to be 9.0 million. Assuming no change in the disposal rate per capita, this represents approximately 229 million tons requiring disposal from 2018 to 2038. Current Type I and Type IV landfill capacity is 328.5 million tons.
7. The City-owned facilities, including recycling drop-off centers, depositories and environmental service centers help facilitate recycling, and proper management of household hazardous waste.
8. There are approximately 500,000 tons of annual capacity at material recovery facilities (MRFs) in the Region. The majority of this capacity is located within the City of Houston. These facilities process comingled recyclable materials for market. Prior to March 2019, the City relied on three MRFs to process comingled recyclables. Since March 2019, the residential co-mingled recyclable materials collected by the City are being taken to the newly constructed FCC MRF located in northeast Houston. The FCC facility has a capacity of 145,000 tons per year.
9. The growth of the mulch and composting industries in the last few years has had an impact on the quantities of materials that would otherwise require disposal. In 2017, over 600,000 tons of organic material were processed regionally and marketed instead of being landfilled.
10. In addition to the City's three transfer stations, there are 10 privately operated transfer stations serving Houston and an additional 8 transfer stations located outside Houston. Twenty-six percent of the waste collected in the region is

The management of MSW in Houston requires a regional, complex, integrated waste management system to meet the MSW needs of Houston's residents and businesses.

Houstonians might be surprised at the amount of recycling taking place in the H-GAC region. Over **800,000 tons of organics** are recovered; over **2.5 million tons of C&D** are processed and recycled; and over **300,000 tons of materials** such as paper, metals and plastics are recovered at Houston material recovery facilities and that does not include private sector recycling such as scrap businesses. Still, over **9.7 million tons of waste are landfilled** in the region.



taken to a transfer station for transfer to one of the area’s regional landfills. An additional transfer station is planned for northeast Houston at the City’s Northeast Service Center.

Figure 5-1
Disposal Quantities in H-GAC Region (million tons/year)



A Complex Regional System

According to TCEQ records, there are 111 TCEQ-authorized municipal solid waste (MSW) management facilities located in Houston (excluding liquid waste facilities). In the H-GAC Region (Region), there are 230 facilities (refer to Table 5-1).

Of the 111 facilities in Houston, 41 are TCEQ-authorized recycling and resource recovery (RR) facilities. These 41 facilities include mixed waste processing facilities and material recovery facilities, electronic recycling, construction & demolition recycling, and shingle recycling.

In addition to these 41 authorized facilities, there are recycling facilities that do not require TCEQ authorization such as the City’s Westpark Consumer Recycling Center and a number of private recycling businesses. An H-GAC database identifies over 32 recycling drop-off centers in Harris County, 21 of which are located in Houston. A review of local data also identified between 150 and 200 businesses that provide some form of recycling services.

There are approximately 18 Houston facilities that either mulch wood or produce compost, and 52 regionally. Composting and wood grinding facilities process yard waste, brush and tree waste, biosolids (digested wastewater treatment plant sludge) and a small amount of food residuals.



The use of transfer stations allows short-haul collection vehicles to transfer waste to larger, more efficient trucks. Given Houston’s traffic conditions, these facilities are especially important to reduce the cost of hauling waste and reducing



vehicle emissions. The City owns three transfer stations and is planning a new facility in northeast Houston. There are 13 operating MSW transfer stations in the City and 21 operating in the Region. An additional eleven transfer stations are permitted regionally but are either inactive or not constructed. In 2017, a total of 2.5 million tons were sent to transfer stations in the Region before being sent to a landfill.

Materials that are not recovered are disposed at one of the 27 operating landfills located in the Region. Twelve of these are municipal solid waste landfills (Type I) and 15 are construction and demolition waste landfills (Type IV). Regionally, over 9.9 million tons of waste were disposed in 2018.

TCEQ-authorized facilities also manage specific waste materials including household hazardous wastes (“HHW”), medical wastes, grease and grit trap wastes and tires. With the exception of nine permitted landfill gas-to-energy operations in the Region, there are no known energy from waste facilities operating in the Region.

Type of Facility	# Authorized in Houston	# Operating in Houston	Authorized in H-GAC Authorized Region	Operating in H-GAC Region
Recycling¹	41	40	76	74
Composting	19	18	54	52
Medical Waste Transfer & Processing	3	3	5	5
Grease & Grit Trap Waste Transfer & Processing	8	5	8	5
Transfer Stations²	19	13	31	21
MSW Landfills – Type I³	2	2	14	12
Construction & Demolition Landfills – Type IV	12	10	17	15
Landfill Gas Recovery	2	2	9	7
Citizen Convenience Centers & Low Volume TS	0	0	11	11

1. Includes C&D recycling, electronics recycling, shingle recycling, mixed waste processing and material recovery facilities. A breakdown of these facilities is presented later in this report. Total operating facilities is uncertain as there are no reporting requirements for these facilities.
2. FCC’s Material Recovery Facility and Republic’s Resource Renewal Complex are authorized as transfer stations but only manage recyclable materials from single stream residential recyclables collections and commercial sector recyclables. Thirteen (13) of the nineteen (19) permitted Houston transfer stations transferred MSW in 2018.
3. One is permitted but not constructed (Darrell Dickey Landfill). Does not include one MSW landfill that accepts primarily commercial/industrial waste that is an industrial waste landfill (Conroe Industrial Non-hazardous Landfill).

MSW Landfills

MSW Landfill Requirements

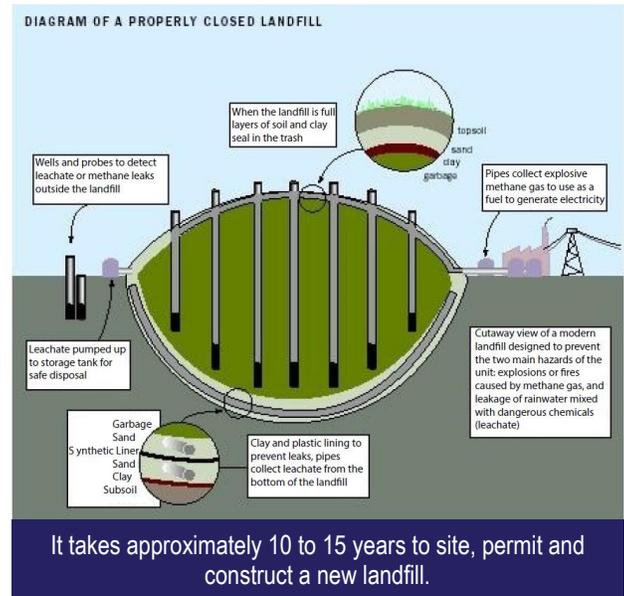
The majority of Houston’s waste is disposed in one of the 12 operating municipal solid waste landfills (Type I) or 15 operating construction and demolition (C&D) landfills (Type IV) in the H-GAC region. The Type I or IV designation refers to the regulatory requirements as governed by the Texas Commission on Environmental Quality (TCEQ). A landfill is an



engineered facility for the disposal of waste. MSW landfills are designed to mitigate potential environmental consequences of disposal, including impacts to water quality, air and land resources. This is accomplished through the use of liner and leachate collection systems, operating practices and ultimately closure and post-closure care of the site. The basic components of a landfill are presented below. It should be noted that the requirements for Type I and Type IV landfills are different because of the differences in the types of waste accepted at each.

Composite liner requirements— typically includes a flexible membrane (i.e., geo-membrane) overlaying two feet of compacted clay soil lining the bottom and sides of the landfill. They are used to protect groundwater and the underlying soil from leachate releases.

Figure 5-2 Landfill Design Concept
Source: U.S. Environmental Protection Agency



1. **Leachate collection and removal systems** - sit on top of the composite liner and remove leachate from the landfill for treatment and disposal.

2. **Operating practices** - include compacting and covering waste frequently with several inches of soil. These practices help reduce leachate generation and odors, control litter, insects, and rodents, and protect public health. Figure 5-2 shows a cross-section of a municipal solid waste landfill.

3. **Groundwater monitoring requirements** - requires testing groundwater wells to determine whether leachate has escaped from the landfill.

4. **Landfill gas management** – as waste decomposes, it produces methane, a gas similar to natural gas. This gas must be managed, which often includes collection and processing for potential energy recovery.

5. **Closure and post-closure care requirements** - include covering landfills and providing long-term care of closed landfills.

6. **Financial assurance** - provides funding for environmental protection during and after landfill closure (i.e., closure and post-closure care).

Regional MSW Landfill Capacity

The City of Houston does not own or operate either a Type I or a Type IV landfill. The City relies primarily on three landfills for the disposal of residential waste collected by SWMD crews. These facilities include McCarty Road, Atascocita and Blue Ridge. With the exception of the Chambers County Landfill, all of the landfills in the region are owned and operated by private entities. The location of regional landfills is presented in Appendix B.

Table 5-2 presents landfill remaining capacity. The three landfills that the City relies on for residential waste disposal have a combined capacity of approximately 38 years. The McCarty Road Landfill has 13 years remaining capacity at current rates of disposal; the Atascocita Landfill has remaining capacity of 24 years at current rates of disposal; the Blue Ridge Landfill has a reported 88 years of capacity at current rates of disposal. On a regional basis, three other landfills (Altair Disposal Services Landfill, Galveston County Landfill and Chambers County Landfill) have 20 years or less remaining capacity. It should be noted that as one landfill reaches its capacity, the waste from that landfill will be directed to another landfill, thereby increasing its annual disposal quantities, and reducing its remaining site life.



**Table 5-2
Type I Landfills – Ownership & Capacity**

Landfill	Owner	Remaining Capacity Tons	Remaining Capacity Cubic Yards	Remaining Capacity Years (2017)
McCarty Road	Republic	23,748,385	21,472,319	13
Atascocita	Waste Management of Texas	29,228,482	38,458,529	21
Blue Ridge	Blue Ridge Landfill TX, LP	87,275,249	142,373,978	86
Houston Primary Landfills		140,252,116	202,304,826	37
Houston Secondary Landfills		127,448,641	157,000,630	40
Total*		267,700,757	359,305,456	31

Source: TCEQ Municipal Solid Waste – A Year in Review 2017. Assumes current rates of disposal. *Does not include Conroe Industrial Non-hazardous Waste Landfill with a capacity of 5.7 million tons and accepted 49,300 tons in 2017

Table 5-3 presents data on historic waste disposal quantities in the H-GAC region. A key assumption used by TCEQ in determining landfill life is that disposal rates remain constant over the life of the facility. However, the continued growth in population and economic activity has resulted in increased annual disposal quantities in the Region. In 2010, the H-GAC region disposed of 5.93 million tons of waste in Type I landfills. By 2017, this quantity increased to 6.97 million tons, a 17.5% increase. Over the same period, the population of the H-GAC region increased from 6.1 million in 2010 to 6.9 million in 2017, a 13% increase (Sources: Texas Demographic Center & Texas Water Development Board). Therefore, on a regional basis, waste disposal per capita increased from 5.22 pounds pcd in 2010 to 5.5 pcd in 2017. The impacts of anticipated growth in the region is discussed later in this report.

Table 5-3 also shows the distribution of market share for these landfills. The three landfills that the City relies on for its disposal accounted for 55% of the waste disposed in the Region. The McCarty Road Landfill owned by Republic Services decreased from 30% of the region’s market share in 2010 to 21% in 2017. The Blue Ridge Landfill, also owned by Republic Services, increased from 9% in 2010 to 16% in 2017. And other than the increase in Fort Bend Regional Landfill’s market share going from 10% to 15%, there have not been major shifts in waste flow over the period 2010 to 2017.

**Table 5-3
Type I Landfills – Annual Throughput (Tons)**

Historical Throughput	2010	2015	2016	2017	2018	2010% Market Share	2018% Market Share
McCarty Road	1,793,086	1,426,088	1,116,310	1,364,814	1,619,174	30%	23%
Atascocita	939,804	1,242,928	1,253,621	1,209,440	1,248,556	16%	17%
Blue Ridge	516,629	1,060,899	1,176,325	1,244,016	1,115,761	9%	16%
Subtotal	3,249,519	3,729,915	3,546,256	3,818,270	3,983,491	55%	56%
Subtotal	2,678,701	3,106,195	3,228,211	3,436,442	3,171,461	45%	44%
Total	5,928,220	6,836,110	6,774,467	7,254,712	7,154,952	100%	100%



Impacts of Growth on MSW Capacity

Table 5-2 shows that the anticipated remaining capacity of the facilities in the region is approximately 37 years. This assumes that annual waste quantities do not increase above the 2017 rate. However, as demonstrated between 2010 to 2017, waste quantities have continued to increase, even at a rate higher than the increases in population. For the planning period, 2018 - 2038, population in the H-GAC region is anticipated to increase from 6.9 million to over 8.8 million. Assuming no increase in waste disposal rates per capita, municipal solid waste quantities will increase from 6.9 million tons per year to 10.9 million tons per year. The amount of waste disposed of cumulatively over the planning period is anticipated to be 190 million tons between 2019 – 2038.

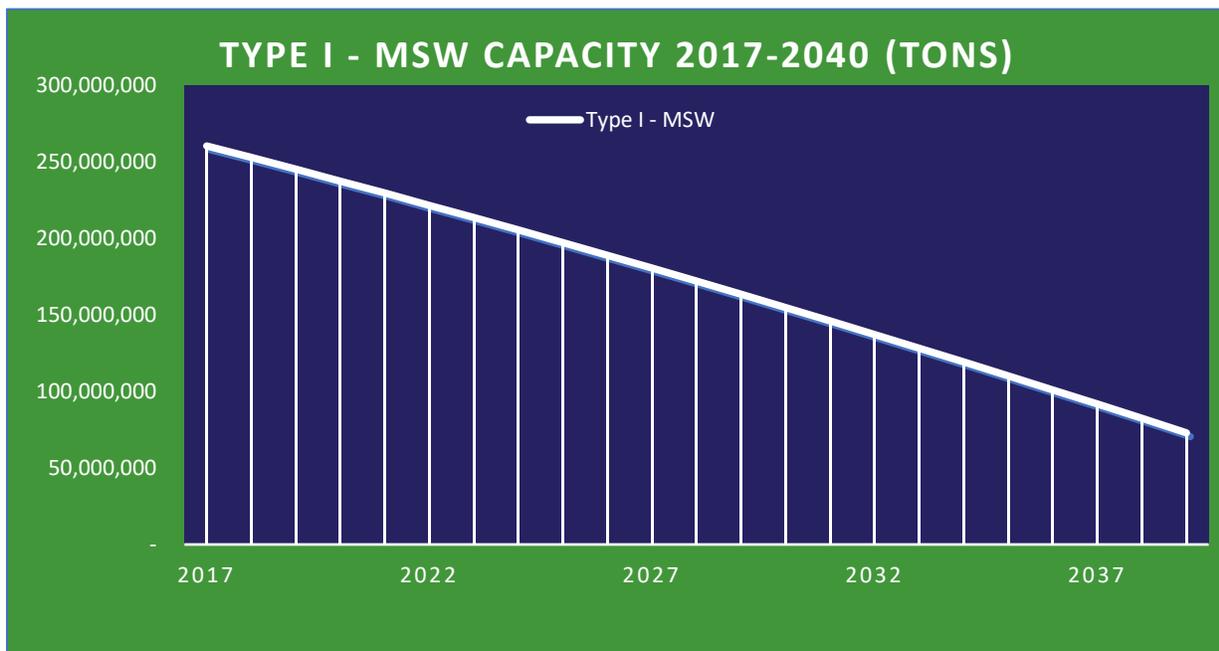
Current regional Type I disposal capacity is 267 million tons. By 2038, 71% of the current disposal capacity will be filled. At the end of the planning period (2040), there is projected to be an estimated 92 million tons of remaining capacity if there are no expansions or new sites permitted (Figure 5-3).

This also does not take into consideration the potential that C&D landfills will have reached capacity and the Type IV waste that would normally go to these landfills may be directed to Type I landfills. It also does not take into consideration other factors including changes in regional economic activity, storm events and the impacts of future source reduction and recycling programs.

If there are no major changes in capacity, and waste disposal quantities continue to increase at projected rates, one landfill will have reached capacity and six landfills, including McCarty Road, will have ten years or less of remaining capacity. Four key factors are uncertain at this time that will affect remaining capacity at any specific landfill.

1. Whether any of the landfills are able to expand their current facility;
2. When a landfill in the region reaches capacity, where the flow of that waste will go and how will it impact a specific landfill's remaining capacity;
3. What factors could impact the waste disposal rate in a way that would reduce annual disposal quantities; and
4. The region's C&D landfills have less capacity than the Type I landfills. It is possible that as C&D options are reduced, some of the waste that currently goes to MSW landfills will ultimately go to Type I Landfills.

Figure 5-3
H-GAC Region - Remaining Capacity





Construction & Demolition Landfills

The H-GAC region has a total of 15 operating Type IV landfills. These landfills are designed to only accept C&D debris and brush. Because they do not accept putrescible waste, the liner and final cover requirements for Type IV landfills are less stringent than the requirements for Type I landfills.

The H-GAC region is unique to Texas in its number of Type IV facilities. Approximately 21% of the total waste stream goes to these facilities compared to the North Central Texas Council of Governments (NCTCOG) region (Dallas/Fort Worth) where only 7% of the waste stream goes to Type IV facilities. In the NCTCOG region, there are only 3 permitted Type IV facilities.

Table 5-4 presents a summary of C&D landfill capacity (60.8 million tons) and 2017 annual disposal quantities (1.85 million tons). (Source: TCEQ Annual MSW Report)

The regional capacity of Type IV landfills is 40 million tons and at current rates of disposal at 1.8 million tons per year, there are 32 years remaining capacity. Of the 40 million tons of regional capacity, 28 million tons are located within Houston City boundaries, or 70%. Houston Type IV landfills disposed 1.4 million tons in 2017, or 77% of the total amount disposed in regional Type IV landfills.

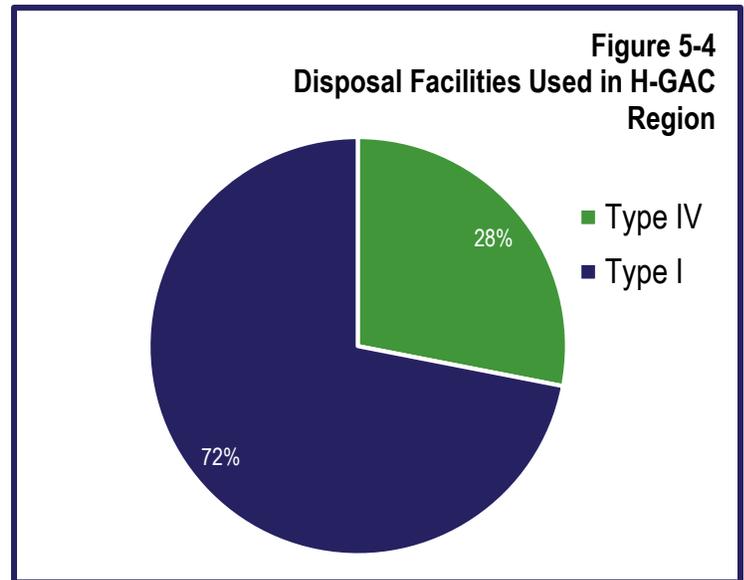


Table 5-4 C&D Landfill Capacity				
C&D Landfills	Tons of Capacity	Cubic Yards of Capacity	2017 Tons	Years Remaining Capacity
Total	60,824,019	104,310,227	1,852,255	22

Table 5-5 presents Type IV landfill disposal quantities for 2010, 2015, 2016 and 2017. As with the case for Type I MSW landfills, the amounts of waste disposed in Type IV landfills has continued to increase from 2010 to present. The 2010 C&D per capita disposal rate was 1.15 per capita per day (pcd); this rate increased to 1.46 pcd in 2018, a 27% increase in pcd disposal. Based on landfill reports to TCEQ, C&D disposal quantities for 2018 increased by approximately 700,000 tons in one year. This is largely due to the impacts of Hurricane Harvey, which occurred in late 2017, but for reporting purposes is shown in 2018. (TCEQ reporting periods are August through September.)

Table 5-5 Historic Type IV Disposal Rates					
C&D Landfills	2010	2015	2016	2017	2018
Total	1,285,919	1,808,309	1,931,682	1,852,285	2,792,082

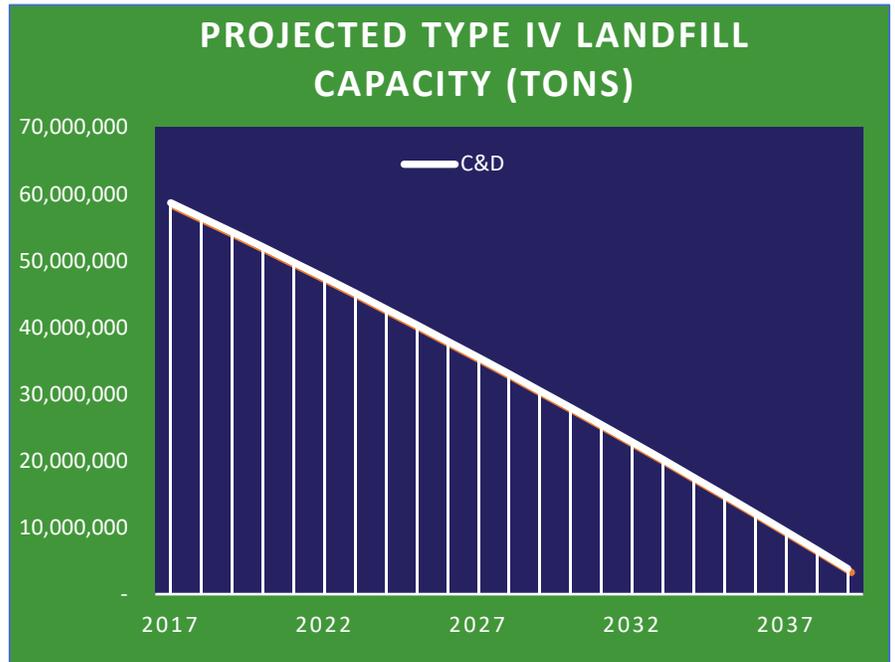


Impacts of Growth on C&D Capacity

Figure 5-5 illustrates remaining Type IV capacity to the year 2040. Regional Type IV landfill capacity is anticipated to reach capacity by approximately 2034. Once these sites reach capacity, waste will have to be disposed at remaining Type I landfills if no additional Type IV capacity is permitted. It should be noted that the majority of waste generated from Hurricane Harvey went to Type IV landfills. Future storm events will significantly impact future Type IV disposal capacity.

By 2020, 5 of the 15 Type IV landfills will have exceeded capacity. In 2040, only 4 of the 15 will have remaining capacity, unless there is additional capacity permitted prior to these years.

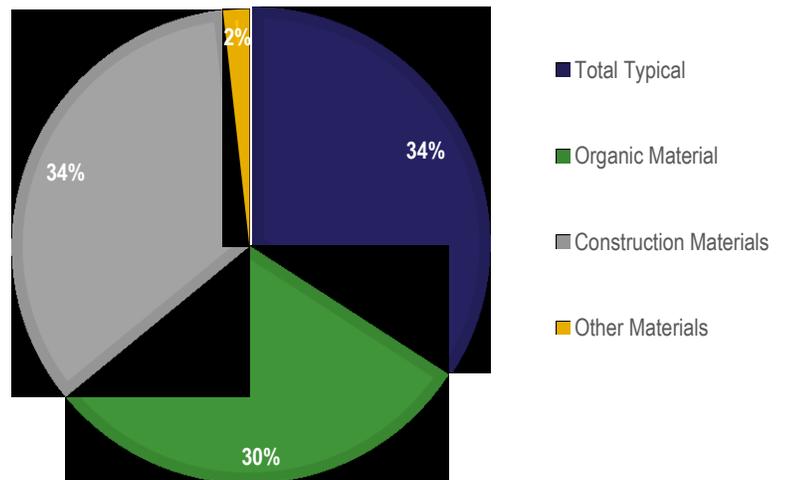
Figure 5-5
Type IV Remaining Capacity (tons)



Recycling Facilities and Environmental Service Centers

Recycling is the process of collecting and processing materials that would otherwise be thrown away as trash and turning them into new products (Source: EPA). Houston’s recycling infrastructure includes material recovery facilities, recycling centers, businesses that pay for recycled materials and processors of materials into new products. According to a TCEQ sponsored report (*Study on the Economic Impact of Recycling- July 2017, TCEQ*), 9.2 million tons of material were recycled in the state of Texas – compared to 31 million tons of waste landfilled state-wide in 2015. This is equivalent to a 23% recycling rate state-wide.

Figure 5-6
Texas Recycles 9.2 Million Tons In 2015



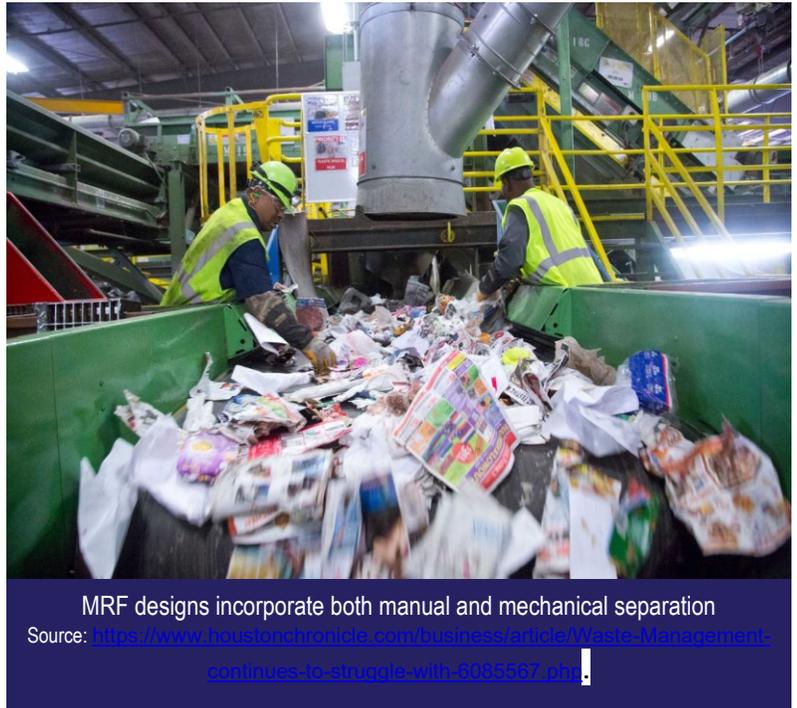


Material Recovery Facilities

The EPA defines a Material Recovery Facility (“MRF”) as “a central operation where comingled and/or source separated recyclables are processed mechanically or manually. Here a separation and/or beneficiation of recyclables prepares them to meet market specifications for sale.”

The City’s curbside recycling program collects comingled or mixed recyclable materials that are put at the curb in a single container in a manner known as single-stream collection. These comingled materials are then transported to a Material Recovery Facility (MRF).

Table 5-6 presents a summary of material recovery facilities located in the Region. **These facilities are designed to process recyclables from both the residential and commercial sectors.** Companies that collect recyclable materials often deliver them to these facilities. Representatives of the industry have indicated that the flow of materials from the commercial sector have increased in recent years as corporations take actions to reduce their environmental impacts.



MRF designs incorporate both manual and mechanical separation
 Source: <https://www.houstonchronicle.com/business/article/Waste-Management-continues-to-struggle-with-6085557.php>

Total capacity of these regional MRFs is over 494,000 tons per year, or 1,590 tons per day assuming an 8-hour operating shift. Additional hours of operation can increase daily and annual throughput of these facilities. There was a reported 307,000 tons of material processed in 2017, or 62% of capacity.

MRF	Address	Owner	2017 Tons Recovered	Capacity Throughput
Gasmer MRF	4939 Gasmer Drive Houston	WM	78,000	120,000 tpy
Houston Clay Road MRF	9590 Clay Road Houston	WM	105,000	204,000 tpy
Westside (Brittmore) MRF	1200 Brittmore Road Houston	WM	87,000	120,000 tpy
Global Waste Services	7172 E Mt Houston Road Houston	WCA	N/A	N/A
Houston Sort Center	5757 B Oates Road Houston	Republic	37,580	50,000 tpy
Independent Texas Recyclers	6810 Irvington Boulevard Houston	Independent Texas Recyclers	N/A	N/A
FCC	9170 Ley Road Houston	FCC	Opened March 2019	145,000 tpy



Organics Processing Facilities

Organic wastes or residuals are often disposed in landfills. However, organics processing facilities are proliferating in the H-GAC region. In the region, many organic wastes and residuals are recycled through the manufacture of mulch and compost rather than being disposed. Approximately 30% of wastes recycled in Texas in 2015 and voluntarily self-reported to TCEQ for the *Study on the Economic Impact of Recycling* was organic materials. That percentage is likely to be higher in the Houston area because of the accessibility and capacity of organics processing facilities. There is also a greater percentage of organic materials available in the Houston market due to its climate and types of vegetation found in the Houston area versus some other parts of Texas. There are no anaerobic digestion or other energy-from-waste facilities in the H-GAC region except from landfill gas.

There are 52 known mulch and compost manufacturers in the H-GAC Region which are available to process organics generated within the City of Houston and divert materials from landfills available to receive the City’s MSW for disposal. Table 5-7 presents a summary of facilities in the H-GAC region based on TCEQ records and interviews with various organics processors in the region.

Table 5-7 presents estimates of the quantities of organics managed at major facilities in the region. Over 235,000 tons were processed at facilities located in Houston and an additional 314,000 tons were processed at facilities located outside the City limits, for a total regional quantity of 549,000 tons. It should be noted that some material produced in Houston is being processed by facilities located outside the City’s boundaries.

Table 5-7 Estimated Throughput and Capacity of Major Facilities		
	Throughput (Tons/yr)	Capacity (Tons/yr)
In Houston	>235,000	481,000
Outside Houston	>613,500	>815,000

Transfer Stations

Transfer stations are designed to improve collection efficiency by transferring waste from collection vehicles to more efficient long-haul vehicles. This allows the collection vehicles to spend more time collecting waste, versus hauling long distances to the landfill. There is a total of 21 operating transfer stations in the H-GAC region, three of which are owned by the City of Houston. Regionally, approximately 26% of the waste collected from the residential and commercial sectors goes to a transfer station before it is sent to a landfill.

Transfer stations can be designed to recover materials including brush and C&D wastes. In 2017, four of the region’s transfer stations reported recovering for diversion 37,370 tons of material sent to the transfer station. Most of the recovered material was either C&D material or brush. Two of the City’s transfer stations are located next to either a depository or a recycling center.



The City’s three transfer stations are these:

1. Northwest Transfer Station (14424 Sommermeyer Street)
2. Southeast Transfer Station (9225 Lawndale Street)
3. Southwest Transfer Station (5904 Westpark Drive)



The City's transfer stations were permitted in 1999 and are operated under contract by Republic Services (last negotiated in 2009). The Southeast and Southwest Transfer Stations are direct-dump operations where waste is deposited on the tipping floor and front-end loaders push the waste into hoppers that direct the waste into transfer trailers. The Northwest Transfer Station is designed to have a grapple crane load the waste into the transfer vehicles. None of the City's transfer stations is currently designed to segregate waste for recovery.

Table 5-8 presents the waste throughput for the City's transfer stations in 2017. The City's transfer stations had a combined throughput of 695,096 tons (Source: City of Houston). Of the 695,096 tons, City trucks delivered 394,779 tons, or 57% of the waste going to these facilities. The City's contract with Republic Services allows it to use the facility for its collection vehicles and other private sector haulers. Approximately 43% of the waste taken to the City's three transfer stations is from private haulers.

	City of Houston	Republic Services	All Other Privates	Total Tonnage
Northwest	86,988	117,418	18,212	222,619
Southeast	194,057	34,927	11,053	240,039
Southwest	113,734	80,306	38,397	232,438
Total	394,779	232,653	67,663	695,096
% of Total	57%	33%	10%	100%

In 2018, the City issued a request for proposals for the design of a new transfer station to be located in northeast Houston. The planned facility location is 5711 Neches Street, Houston, Texas.

Table 5-9 provides a summary of transfer stations in the H-GAC region. There are 31 permitted transfer stations in the H-GAC region; however, only 20 are accepting waste. A total of 2.3 million tons of waste was directed to these transfer stations in 2017, which is equal to 26% of the total amount of waste (MSW + C/D) that was disposed in the Region for that year. On average, 7,300 tons per day are sent to regional transfer stations.

The City currently relies primarily on their own facilities, but at times have used private transfer stations including the Rufino Transfer Station. Approximately two-thirds of the City's MSW is sent to a transfer station before going to the landfill.

Name	2011 (TPY)	2015 (TPY)	2016 (TPY)	2017 (TPY)	Permitted Capacity (TPD)	2017 (TPD)
Houston SW Transfer Station	311,435	292,856	271,317	244,213	2,000	783
Houston NW Transfer Station	162,482	226,364	220,391	217,157	2,000	696
Houston SE Transfer Station	194,793	219,022	229,169	241,632	2,000	774
HSWMD Transfer Station Total	668,710	738,242	720,877	703,002	6,000	2,253
Houston Private Sector TS	746,997	1,612,791	1,577,825	1,582,303	19,625	5,071
HSWMD TS Total + Private Sector TS	1,415,707	2,351,033	2,298,702	2,285,305	25,625	7,325
Outside Houston TS Total	95,214	119,803	126,381	224,323	NA	711
Total Transfer Station	1,510,921	2,470,836	2,425,083	2,509,628	NA	8,036



Note: Totals for Houston transfer stations may vary from Table 5-9 due to differences in reporting periods.

Other Waste Management Facilities

Other facilities assessed as part of the planning process that are presented in the Facilities Report include:

1. Grease and grit trap waste facilities
2. Tire Facilities
3. Medical Waste Facilities
4. Used Oil
5. Battery Recycling
6. Ash Management Sites



6.0 Strategic Analysis

Based on the City’s needs, resources and current services, the Project Team identified a number of strategies in the form of either policies or programs that could be implemented to achieve the City’s goals and objectives for the solid waste management system (System). This section defines these policies and programs as well as the Mayor’s Advisory Task Force’s (MATF) priorities. The Strategic Analysis Report evaluates these options using the following criteria.

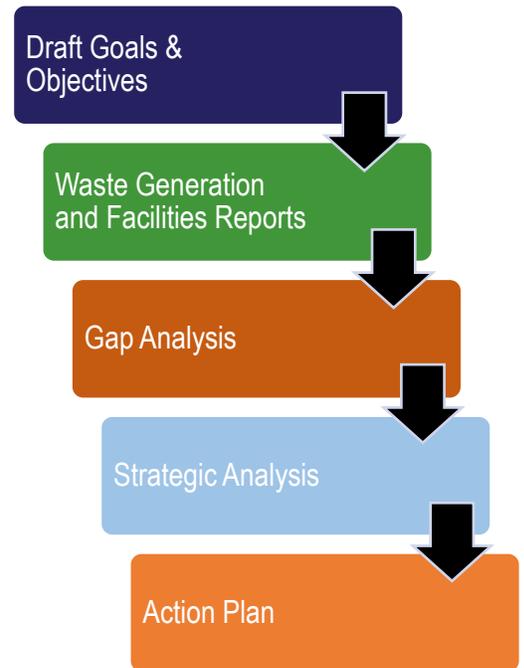
As part of the Planning Process, the Project Team prepared in-depth Options Analysis Reports. These Reports evaluate each of the options presented to, or suggested by, the MATF.

- Impact on the waste stream and other environmental impacts
- Technical feasibility
- Regulatory and legal issues
- Financial impacts
- Complexity of implementation and administrative requirements
- Social issues and environmental justice

The MATF priorities for strategies related to waste minimization, reuse, recycling and organics management are presented in this section, as well as the MATF’s input on collection services and long-term disposal capacity risks. The Project Team also identified strategies options that are consistent with the City’s Climate Action Plan and Resiliency Plan.

Process

The first step in the planning process was the establishment of Draft Goals and Objectives for the Plan. These Draft Goals and Objectives provided direction as to the types of services to be provided and policies and programs that should be adopted to achieve the City’s vision. The Project Team conducted workshops with both the MATF and SWMD senior management to better understand key local issues and MATF priorities for the City’s future program. This section presents a summary of policy and program options and priorities for the following system elements:



- | | |
|---|------------------------------|
| ▪ Financial Sustainability | ▪ Transfer Stations |
| ▪ Waste Minimization, Reuse & Recycling | ▪ Energy & Resource Recovery |
| ▪ Organics Management | ▪ Assuring Disposal Capacity |
| ▪ Collection | ▪ Illegal Dumping |

Financial Sustainability

A key to the City’s ability to implement an integrated solid waste program is adequate funding for staff, equipment and services such as material processing and waste disposal. The City’s program is funded through the General Fund, which is different than other cities that rely on enterprise funds that are financed via a solid waste user fee, and sometimes also a monthly Clean City Fee. **Based on an initial review of the City’s budget in comparison to other cities, Houston’s solid waste program is underfunded between \$20 million and \$40 million per year. The following section presents a description of alternative options to fund the City’s solid waste program.**



Enterprise Funds and User Fees

Enterprise funds are created by municipal governments throughout the United States to provide a variety of governmental services in a manner that allows them to operate as business units that are financed through user fees versus tax revenues. The vast majority of solid waste utilities located in Texas are operated within an enterprise fund and charge a user fee, as do many of the solid waste utilities located within the United States. Similar to the City of Houston’s water and wastewater utility, the solid waste utility would be able to issue revenue bonds if it were in an enterprise fund, which would prevent the City from needing to utilize its general obligation debt capacity to fund solid waste related capital needs. This preserves the general obligation debt capacity to fund “traditional” General Fund activities (police, fire, etc.).

The vast majority of solid waste utilities within Texas, and many throughout the United States, rely upon a dedicated solid waste user fee that is “cost-based” so as to ensure that all operating and capital costs required to operate a solid waste system, including the routine replacement of vehicles as they reach the end of their useful life, are fully funded and there is a sustainable revenue stream for the utility.

Unfortunately, when a solid waste utility is reliant upon the General Fund for tax revenues to fund its operations, if unexpected issues arise that were not budgeted (recessions, storm events, etc.), it is not uncommon to have the solid waste utility’s capital budget severely restricted or even eliminated due to other pressures placed on the General Fund. Placement of a solid waste utility within an enterprise fund, with an equitable, cost-based solid waste user fee funding mechanism, will ensure that utility a consistent and reliable revenue source, while ensuring service reliability.

The MATF was unanimous in its agreement that the City needs an Enterprise Fund paid for with Service Fees to pay for solid waste services.

Municipal Solid Waste Funding Options Used by Other Cities in Texas and the U.S.

Below is a brief summary of some of the different types of user fees that have been implemented by cities within Texas, as well as throughout the United States. In reviewing the ten largest cities in the Houston-Galveston Area Council (H-GAC), the Project Team found that all cities except Houston have a solid waste user fee. Seven of the cities charge a separate, dedicated monthly solid waste user fee. In Pasadena, the monthly user fee is included as a component of the monthly water bill. In The Woodlands, the fee is assessed along with property taxes once a year. The user fees charged by these cities are shown in Table 6-1. In Texas all ten of the largest cities in the state have a residential solid waste user fee - except for Houston. While these nine cities have different types of residential solid waste user fees (flat monthly fee, variable rate for different size cans, base charges, clean city or environmental fees, etc.), they all have the one common factor of a user fee – ensuring a reliable revenue stream so as to provide sufficient funding to pay for the operating and capital costs (trucks, transfer station capital repairs, etc.) associated with providing the citizens of their respective cities with the necessary solid waste and recycling services in a financially sustainable manner. The user fees charged by these cities are shown below in Table 6-2.



**Table 6-1
Ten Largest Cities in the H-GAC Region**

Rank	City ¹	Population	Monthly Solid Waste User Fee ²
1	Houston	2,325,502	\$ -
2	Pasadena ⁴	151,718	24.50
3	The Woodlands ⁵	108,070	14.15
4	Pearland	102,513	20.11
5	League City	95,735	18.26
6	Sugar Land	91,192	19.38
7	Missouri City	74,092	13.26
8	Baytown	73,720	27.71
9	Conroe	66,181	16.19
10	Galveston	49,471	20.48

1. The Woodlands is classified as unincorporated territory but was included for the purposes of this comparison.
2. Cities are ranked by population size according to U.S. Census Bureau
3. A 96-gallon cart is chosen if/when other options are available to keep service level and cost comparisons equal
4. The charge for solid waste service in Pasadena is included with the water bill.
5. Residents of The Woodlands pay \$169.80 for solid waste collection once a year, collected with property taxes. $\$169.80 / 12 = \14.15 .

**Table 6-2
Ten Largest Cities in Texas Monthly Residential Solid Waste User Fees**

Rank	City ¹	Monthly Solid Waste User Fee ²	Monthly Clean City or Environmental Fee	Enterprise Fund
1	Houston	\$ -	\$ -	No
2	San Antonio	26.76	3.24	Yes
3	Dallas	31.00	-	Yes
4	Austin	43.50	8.95	Yes
5	Fort Worth	22.75	.50	Yes
6	El Paso	19.00	5.00	Yes
7	Arlington	16.01	-	No
8	Corpus Christi	16.91	-	No ³
9	Plano	16.10	-	Yes
10	Laredo	18.00	-	Yes

1. Cities are ranked by population size
2. A 96-gallon cart is chosen if/when other options are available to keep service level and cost comparisons equal
3. Located in the "Utility System Fund"

In reviewing the twenty-five largest cities in the United States, the Project Team found that 16 have a solid waste user fee or dedicated "solid waste tax assessment," with two more considering the implementation of a user fee (New York, Denver). That means 72% of the cities have a dedicated funding mechanism or are considering implementing such a mechanism. It should be noted that several cities that do not have user fees identified a variety of issues regarding illegal dumping, litter, etc. The user fees



charged by the 25 largest cities in the United States are shown in Table 6-3. In addition, some cities that do not have solid waste user fees have access to other types of revenue streams. For instance, New York City has access to several other tax revenue streams, such as a personal income tax, as well as a business income tax.

**Table 6-3
Twenty-five Largest Cities in the US**

Rank	City ¹	Population	Monthly Solid Waste User Fee	Monthly Clean City or Environmental Fee	Total Monthly Fee
1	New York City ³	8,398,748	\$ -	\$ -	\$ -
2	Los Angeles	3,990,456	36.32	-	36.32
3	Chicago	2,705,994	9.50	-	9.50 ⁵
4	Houston	2,325,502	-	-	-
5	Phoenix	1,660,272	30.55	-	30.55
6	Philadelphia ⁴	1,584,138	-	-	-
7	San Antonio	1,532,233	26.76	3.24	30.00
8	San Diego	1,425,976	-	-	-
9	Dallas	1,345,047	31.00	-	31.00
10	San Jose	1,030,119	107.67	-	107.67
11	Austin	964,254	43.50	8.95	52.45
12	Jacksonville	903,889	12.65	-	12.65
13	Fort Worth	895,008	22.75	0.50	23.25
14	Columbus ⁴	892,533	-	-	-
15	San Francisco	883,305	78.17	-	78.17
16	Charlotte	872,498	8.93	-	8.93 ⁶
17	Indianapolis	867,125	12.93	-	12.93 ⁷
18	Seattle	744,955	115.90	-	115.90
19	Denver ³	716,492	-	-	-
20	Washington DC	702,455	-	-	-
21	Boston	694,583	-	-	-
22	El Paso	682,669	19.00	5.00	24.00
23	Detroit	672,662	20.00 ⁸	-	20.00
24	Nashville	669,053	-	-	-
25	Portland	653,115	43.60	-	43.60

1. Per U.S. Census Bureau – 2018 Population Estimate
2. A 96-gallon cart is chosen if/when other options are available to keep service level and cost comparisons equal
3. Discussions being held regarding development of a user fee
4. Cities having litter / illegal dumping issues
5. This fee pays for a “portion” of the residential solid waste services
6. Residents are assessed a specific fee on their property taxes to “offset” the cost of waste collection, disposal, and recycling services
7. Indianapolis Solid Waste Special Service District charges a tax rate of \$0.0862 on each \$100 net assessed value. Median house price of \$180,000 x 0.0862 per \$100 = \$155.16 / 12 months = \$12.93 per month
8. Residents of Detroit pay \$240 for solid waste collection once a year. \$240 / 12 = \$20.

Municipal Solid Waste User Fee Estimate

In order to develop an estimate of what Houston residents might expect to pay with regard to a solid waste user fee (if one were implemented), it is essential to first have a rough estimate as to the operating and capital requirements



associated with operating a solid waste utility the size of Houston's. Therefore, the Project Team developed high level estimates for what the City would need to spend on an annual basis for rolling stock (trucks, trailers, etc.) (Table 6-4), other capital needs (Table 6-5) as well as other operating costs (Table 6-6) if the solid waste utility were to be operated in an enterprise fund versus the General Fund. Each of these amounts are detailed in the tables below, with the total cost summarized and an estimated solid waste user fee shown in Table 6-6.

Therefore, the Project Team developed a preliminary estimate of the potential capital needs regarding rolling stock. Table 6-4 shows that the City needs to purchase on an annual basis approximately 41 garbage trucks and 7 transfer trailers. The analysis supporting the need to purchase on average 41 trucks and 7 trailers per year assumes an annual replacement of front-line automated sideloader (ASL) vehicles based on a seven-year useful life, and a ten-year useful life for all other vehicle types, which is fairly standard within the industry.

Table 6-4 Capital Needs - Vehicles							
Vehicle Type	Number of Trucks	Frontline %	Frontline Trucks ⁴	Useful Life (Years) ⁵	Annual Number of Replacements ⁶	Replacement Cost ⁷	Annual Capital Need
ASL Garbage	111 ¹	100%	111	7	16	\$ 280,863	\$ 4,493,808
ASL Recycling	50 ²	100%	50	7	8	280,863	2,246,904
Knuckle Boom	41 ³	80%	33	10	4	183,374	733,496
Roll-off	16 ³	80%	13	10	2	140,778	281,556
Rear Load	40 ³	80%	32	10	4	181,661	726,644
Tractor Truck	77 ³	80%	62	10	7	88,486	619,402
Trailer	77 ³	80%	62	10	7	72,500	507,500
Capital Purchase							\$ 9,609,310

1. ASL Garbage requirement was determined by taking the 2020 Budget number for households served (396,730) and dividing those households by the City's goal of 900 households/garbage route and 4 service days, with weekly collection. The calculation is as follows: $396,730/900/4 = 111$ (rounded up).
2. ASL Recycling requirement was determined by taking the 2020 Budget number for households served (396,730) and dividing those households by the City's goal of 1,000 households/recycling route and 4 service days, with every other week collection. The calculation is as follows: $396,730/1000/4 \times 0.5 = 50$ (rounded up).
3. Per email from City staff 10/14/2019. This number includes reserves.
4. Per City staff, 20% reserve rate. Calculated as number of vehicles times frontline %. E.g. knuckle booms, $41 \times 80\% = 33$ (rounded up).
5. Industry standard useful lives.
6. This number is calculated by dividing the frontline vehicles by the useful life and rounding up. E.g. ASL Garbage, $111/7 = 16$.
7. Per spreadsheet "SWM Fleet As of 10-8-19" from Fleet Services on 10/8/2019.

In addition to the capital needs associated with rolling stock, there are other capital needs that need to be incorporated into a potential solid waste user fee. These costs have been listed below in Table 6-5; and in order to "levelize" these costs over an extended period of time, the Project Team has assumed a 20-year bond is issued at a 5% interest rate to fund these capital needs. It is important to note that these are not all of the capital needs that would be required by the City's Solid Waste Management Department. Table 6-5 merely shows those capital costs that have been identified at this time. To thoroughly forecast all of the required capital costs, it is critical that the City develop a comprehensive 10-year Capital Improvement Plan (CIP) for the solid waste utility.



Table 6-5 Capital Needs - Other	
Facility	Amount
New Depositories ¹	
5 x \$ 1,640,000	\$8,200,000
Transfer Station Repairs ²	
Northwest Transfer Station	\$4,801,139
Southwest Transfer Station	650,118
Southeast Transfer Station	3,846,242
Transfer Station Repairs Subtotal	\$9,297,500
New Transfer Station – Northeast ³	\$8,000,000 - \$10,000,000
Total Capital Needs⁴	\$25,497,500 – 27,497,500
20 Year Bond Issue at 5%	\$2,126,228

1. Per City Staff – per City General Services Department – 2018 (not including land).
2. Solid Waste Disposal Asset Valuation – City of Houston Solid Waste Management Department – July 16, 2012 SAIC. Inflated at CPI for non-residential construction, 1.86% per year for 2012-2019.
3. High level estimate. \$10 million assumed for debt issue.
4. This is not a comprehensive list of all capital needs, but merely a preliminary assessment.

If the City elects to place the solid waste utility within an enterprise fund, there are several costs that should be budgeted regarding the solid waste utility receiving support services from the General Fund as well as for the billing for solid waste services, which would most likely be provided by the City’s utility billing function (i.e. water and wastewater utility). The costs in Table 6-6 are merely estimates and would need to be finalized as part of a comprehensive cost of service study if the City were to elect to implement a residential solid waste user fee.

Table 6-6 Other Costs			
Cost	Amount		
General Fund – Support Services ¹			\$1,000,000
Customer Billing	Customer Count	Billing Fee ²	Annual Expense
Residential	462,736 ³	\$ 0.75	\$ 4,164,624
Multi-Family	478,538 ³	0.75	4,306,842
Commercial	38,975 ⁴	0.75	350,775
Customer Billing Subtotal			\$ 8,822,241
Grand Total			\$ 9,822,241

1. Estimated costs for legal, financial, procurement, and human resources. This cost varies widely by city. NewGen believes this to be a conservative estimate.
2. Estimated cost, typically paid to the municipality’s water and wastewater utility, or electric utility (if municipally owned and operated). This fee typically ranges from \$0.50 to \$1.00 per month per account. NewGen assumed \$0.75 per account.
3. Per Waste Generation Forecast
4. This number was calculated on a pro-rata basis using Fort Worth’s number of commercial accounts and population compared to Houston’s.



Clean City Fees

Based on the Solid Waste Management Department’s FY 2020 budget, and the assumptions shown in Tables 6-4, 6-5 and 6-6, the Project Team developed a high-level estimate of what a user fee might potentially be for the City of Houston if it were to move towards the creation of a monthly residential solid waste user fee. The analysis shown in Table 6-7 is an estimate using the FY 2020 Solid Waste Management Department budget of \$84,956,973 and the Recycling Revenue Fund budget of \$4,934,277 as a starting point. Based on this analysis it is estimated, as shown in Table 6-7 the user fee would be approximately \$22.40 to \$23.05 per month per single-family residential account.

Table 6-7 Estimated Monthly Residential User Fee			
	FY 2020	Inflation Adjustment	FY 2021
FY 2020 SWMD Budget	\$ 84,956,973	3%	\$ 87,505,682
FY 2020 Recycling Revenue Fund Budget	\$ 4,934,277	3%	\$ 5,085,305
Rolling Stock Capital Requirement	\$ 9,609,310 ¹	3%	\$ 9,897,589
Other Capital Requirement (Debt)	\$ 2,126,228 ²		\$ 2,126,228
Other Costs	\$ 9,822,241 ³	3%	\$ 10,116,908
Total Costs	\$ 111,449,028		\$ 114,728,713
Households	396,730	1.28% ⁴	401,808
Cost/HH/Month	\$ 23.41		\$ 23.79

1. Per Table 6-3, Capital Needs - Vehicles
 2. Per Table 6-4, Capital Needs – Other
 3. Per Table 6-5, Other Costs
 4. Household annual growth rate per Waste Generation Forecast

The Project Team investigated establishing a Clean City Fee for the City. The Project Team looked at Austin, Fort Worth, and San Antonio for comparison purposes while researching clean city or environmental fees in the State of Texas. Through communication with staff members for each city and research of online information, the Project Team developed an understanding of the use and application of such fees. In general, clean city or environmental fees are used to defray costs incurred by solid waste management departments for activities that cannot be assigned to individual customers, such as illegal dumping clean-up. The fee is generally charged to all residents, even if they are not customers of the city’s solid waste management department. The fee is also charged to commercial and industrial accounts. Table 6-8 shows a summary of the fees for the comparison cities.



Table 6-8 Clean City Fees			
Customer Type	Austin	Fort Worth	San Antonio
Residential	\$8.95 total <ul style="list-style-type: none"> ▪ \$4.70 to Solid Waste Department ▪ \$4.25 to Code Enforcement 	Apartment Complexes: \$0.50/unit Residential: \$0.50	\$3.24 total <ul style="list-style-type: none"> ▪ \$2.244 to Solid Waste ▪ \$1.00 to Parks
Commercial	\$16.50	\$10	\$3.24 total <ul style="list-style-type: none"> ▪ \$2.244 to Solid Waste ▪ \$1.00 to Parks
Industrial	\$16.50	\$35	\$3.24 total <ul style="list-style-type: none"> ▪ \$2.24 to Solid Waste ▪ \$1.00 to Parks

Austin: Austin calls their fee the “Clean Community Fee.” The fee is associated (i.e. linked to the individual or business) with an electric meter. However, there are sections of Austin where Austin Energy is not the electric provider, but Austin Water and Austin Resource Recovery (ARR) are service providers. In this scenario ARR would add the Clean Community Fee to the water account if a physical structure is present. For multi-unit structures, both residential and commercial, the City’s premise management team determines the number of units by reviewing site plans. The Clean Community Fee is applied to each unit in the structure. For example, in an apartment complex with a leasing office, each apartment unit would be billed the residential fee, and the leasing office would be billed the commercial fee.

The solid waste portion of the fee funds services such as street sweeping, litter abatement, Recycle & Reuse Drop-Off Center, business outreach, Austin Reuse Centers, zero waste program development, Clean Austin, dead animal collection, and boulevard sweeping.

Fort Worth: Fort Worth calls their fee the “Environmental Protection Fee.” Revenues from the fee are handled by the City’s Code Enforcement Department. The fee is associated with water meters. For apartment complexes with a master meter, the residential fee is billed to each apartment unit and the commercial fee is billed to the leasing office. For commercial properties with multiple businesses, such as strip malls, the commercial fee is assigned to each business unit. The Code Department has on file the number of individual units associated with a property. The number is updated for each property every two years. Fort Worth also charges a separate industrial fee.

Revenues generated by the fee primarily cover activities associated with hazardous waste. Revenues may also cover costs for disposal services, environmental programs or environmental services. These dedicated funds help the City pay for federal and state environmental mandates such as cleaning up abandoned property, asbestos abatement, underground storage tank compliance, storm water management, spill response clean-up, and operation of a household hazardous waste collection facility.

The Environmental Protection Fee was instituted in 1996. The fee amount has not changed since then. According to City staff, 75% of residents indicated in a survey that they would be willing to raise the fee to \$2/month.



San Antonio: San Antonio calls their fee the “Environmental Fee.” The fee is associated with electric meters. For multi-unit structures, the fee is on the submeters, so each individual apartment or business unit is billed the fee. The fee is also on electric meters associated with things like lighted billboards, pump stations, etc.

This fee is intended to defray expenses incurred to clean up illegally dumped waste, collecting and disposing of dead animals, performing regulatory maintenance on closed landfills, providing environmental services to the City's park system, and equitably sharing costs for neighborhood clean-ups benefiting residents and businesses that do not pay a monthly solid waste processing fee.

Based on Houston’s current population, and assuming a \$1 fee for residential customers and a \$5 fee for commercial/industrial accounts, the SWMD could expect to generate approximately \$13,633,788 in revenue from an clean city fee. The calculation is shown in Table 6-9 below. The actual fee amounts would be determined by what programs would be funded through the fee.

Table 6-9 Houston Proposed Monthly Clean City Fee Revenue			
Customer Type	Number of Customers	Fee Amount	Annual Revenue
Residential	462,736 ¹	\$1	\$ 5,552,832 ³
Multi-Family	478,538 ¹	\$1	5,742,456
Commercial/Industrial	38,975 ²	\$5	2,338,500
Total			\$ 13,633,788

1. Per Waste Generation Report
 2. This number was calculated on a pro-rata basis using Fort Worth’s number of commercial accounts and population compared to Houston’s. Fort Worth’s population is 895,008, Houston’s population is 2,325,502. Fort Worth’s number of business accounts is about 15,000. $2,325,502 / 895,008 \times 15,000 = 38,975$.
 3. Calculation: $462,736 \text{ customers} \times \$1 \times 12 \text{ months} = \$5,552,832 \text{ annual revenue}$.

Other Financial Recommendations

Develop a ten-year capital improvement plan. The City must maintain several facilities including transfer stations, environmental service centers, depositories and recycling facilities as well as a large fleet of vehicles. The City should prepare a comprehensive capital improvement plan that forecasts long-term needs and updates this on a regular basis.

Continue to secure grants for program implementation. The City has been successful in securing grants from agencies such as H-GAC and other public and private entities. In order to expand the scope of the City’s waste minimization and recycling efforts, it should expand its outreach in securing grants. As an increasing number of private entities take greater interest in reducing their environmental footprint, the City should reach out to the private firms and associations for such grants. It is recommended that a task force focusing on the private sector be formed to assist in implementing the Plan.

Begin discussions concerning a solid waste user fee. The Project Team would recommend that the City’s executive management and solid waste management staff begin discussions regarding the benefits of a solid waste user fee and how it might benefit the General Fund. This would include developing a plan for how to address this topic with the various constituents that comprise the City of Houston.

Develop a comprehensive solid waste cost of service, rate design and Clean CityFee study. Concurrent with the first three recommendations, the Project Team would recommend a comprehensive cost of service study be undertaken (including the development of a ten-year capital improvement plan). This will allow the City to accurately forecast the



City's capital and operating costs for current and new solid waste and recycling programs and the associated user fees and Clean City Fees required to fund these programs in a long-term sustainable manner.

Landfill Disposal

Landfill Policy Issues

- Regional MSW landfills (Type I landfills) have approximately 30-40 years of remaining capacity. The three landfills that the City primarily relies upon for disposal are the McCarty Road Landfill, the Atascocita Landfill and the Blue Ridge Landfill. Respectively, these landfills have 13, 25 and 80 years of remaining capacity at current rates of disposal.
- The City's current landfill contracts were renegotiated in 2020. These agreements establish tipping fees and operational requirements for the City's transfer stations and rates for landfills.
- There is approximately 20-30 years of remaining disposal capacity at C&D (Type IV) landfills.
- Reliance on the private sector for waste disposal reduces certain financial risks to the City. These include potential environmental liabilities, costs of construction and operation, and long-term financial responsibility for the sites.
- It takes 10-15 years to site, permit, design and construct a new landfill.
- There are TCEQ regulations related to where landfills can be located and three counties in the H-GAC region have site location ordinances.
- Other site selection criteria include proximity to sensitive land uses such as schools and hospitals and access to roadways, among others.
- Environmental justice issues must be considered when selecting a site for a new landfill.



**The City relies 100%
on the private sector for
its disposal needs.**

Five key factors that will affect remaining MSW landfill capacity at any specific landfill include the following:

- Is there the potential that the landfill can expand its current capacity by either going higher or adding acreage?
- A new landfill in the region is permitted and constructed.
- After a regional landfill reaches capacity, which landfill will accept the waste previously disposed at the closed landfill?
- Potential significant reductions in waste through waste reduction or recycling efforts exist.
- The region's Type IV landfills have less capacity than the Type I landfills. It is possible that as Type IV options are reduced, some of the waste that currently goes to Type IV landfills will ultimately go to Type I Landfills.



MATF Survey Question: *What do you believe are the biggest disposal issues facing Houston?*

The City is required by law to assure that there is at a minimum once-per-week collection of municipal solid waste. Other services provided by the City are intended to improve the environment (recycling and recovery programs) and increase the availability of disposal options (depositories). Table 6-10 presents the MATF’s scoring of the significance of disposal.

Table 6-10 Major Disposal Issues Identified by the MATF				
Challenges	Very Significant 3 points	Significant 2 points	Not a Concern 1 point	Score
MSW Landfill capacity being 30-40 years	4	4		20
C&D Landfill capacity being 20-30 years	5	3		21
City has no control over new capacity	3	2	1	14
Anticipated cost increases of disposal	5	2		19
Selecting sites for new landfills	9	1		29
Environmental justice related to new facilities	4	2	1	17
Environmental impacts of landfills	3	4	1	18
Distances waste will have to be hauled when close-in landfills reach capacity	8	2		28
Points	3	2	1	

The MATF ranked disposal issues from most significant to least significant, as follows.

1. Selecting sites for new landfills
2. Distances waste will have to be hauled when close-in landfills reach capacity
3. C&D Landfill capacity being 20-30 years.
4. MSW landfill capacity being 30-40 years.
5. Anticipated cost increases of disposal
6. Environmental impacts of landfills

Figure 6-1 illustrates landfill capacity in 2040 if there are no significant changes in current facilities or new facilities sited. All of the landfills in the H-GAC region have indicated that they accept waste from Harris County. By the year 2040, five landfills, including McCarty Road and Atascocita will have reached capacity.

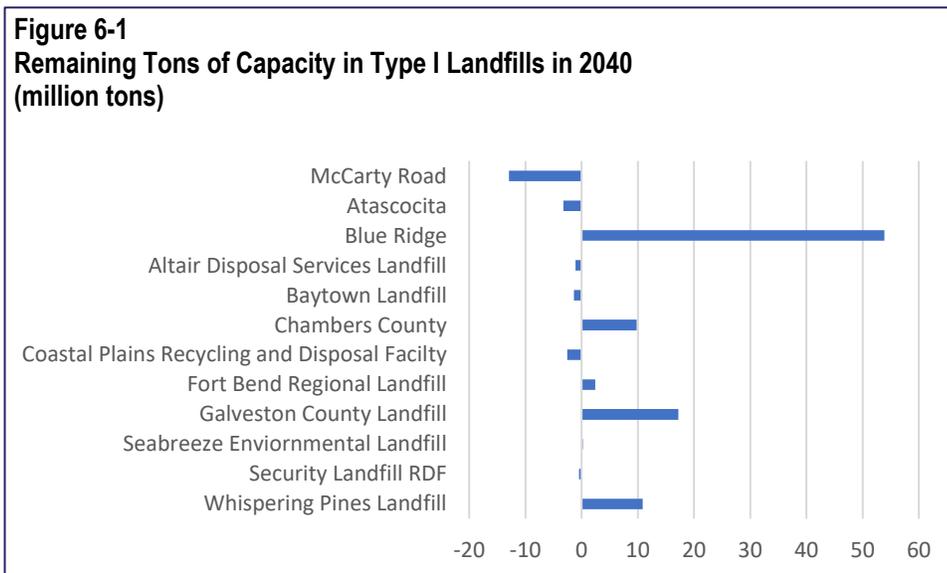


Figure 6-1 illustrates remaining MSW landfill capacity in 2040. Without major changes, capacity falls from approximately 267 million tons in 2018 to 72 million tons in 2040. Seven of the 12 landfills will have reached capacity before 2040 unless capacity additions or new landfills are identified.



The City's contract for both transfer stations and landfill disposal expired in 2019. The City is in the process of renegotiating these agreements. This action item is to sign mid-term agreements for the disposal of waste that is not part of the transfer station agreement. The City's contract for disposal provides the City the option to direct haul waste from the point of collection to the landfill site without using one of the transfer stations. These contracts are used in instances where the landfill is closer to the point of generation than the transfer station, or in times when the transfer station may not be operational. In 2019, approximately 25% of the City's waste was directly hauled to a landfill. Landfills that the City has relied on for direct haul include the Atascocita Landfill and the Blue Ridge Landfill and Waste Management Type IV landfills.

Continuously monitor landfill capacity in the region. For residential waste, the City relies on landfills through agreements with private operators, whether through the transfer station agreement or the landfill agreements. These agreements provide for disposal services for 10 years. A review of TCEQ annual reports indicates that all MSW landfills in the region reported that they accepted waste from Harris County. A number of factors will affect this regional capacity including continued regional population increases, economic activity, success of waste minimization and recycling programs, storm events and other factors. Also, as C&D landfill capacity decreases with the closure of Type IV landfills over the next, 20 years, this C&D waste will have to be disposed of at MSW landfills. However, there is also the potential that landfill owners will seek to expand current facilities, adding to regional capacity.

There are three landfills in the H-GAC region that are currently pursuing permit amendments to expand their landfills.

Seabreeze Landfill Expansion: In January 2019, the Type I Seabreeze Landfill owners filed a permit amendment to modify their facility. The amendment will add approximately 14.5 million cubic yards of capacity.

Greenhouse Road Landfill Expansion: Currently, the Greenhouse Road Type IV landfill is seeking a permit expansion from TCEQ. The expansion is projected to add approximately 23 years to the facility's life.

Tall Pines Landfill Expansion: The Tall Pines Landfill Expansion permit amendment was originally filed in 2016. The amendment would increase capacity from 11.8 million cubic yards to 26.9 million cubic yards.

City should site, permit and contract a City-owned landfill to meet the City's long-term disposal needs. The City relies entirely on private-sector landfills to meet its disposal needs. This places long-term risks of not having available disposal capacity for MSW not only generated by the City's residential sector, but also the City's businesses and institutions.

A landfill site for the City should be between 600 and 1000 acres. This size of the parcel will allow for significant buffer zones, long-term disposal capacity and the ability to site ancillary waste management facilities (maintenance facilities and material recovery operations) at the same location. There are federal regulations pertaining to where landfills can be located and what areas are restricted from landfills. Restricted areas are those close to airports, floodplains, wetlands and certain geologic conditions. Landfill sites should also take into consideration proximity to schools, hospitals, cemeteries, historic sites and other sensitive land uses. Environmental Justice issues must also be assessed as part of the site selection process.

There are three possible scenarios for Houston's future MSW disposal program.

1. Continued reliance on the private sector for disposal of waste;
2. City ownership of a landfill with public operations; and
3. City ownership of a landfill with private operations, similar to how the City manages its transfer stations.

Examples of landfill ownership and operation are presented in Table 6-11



Table 6-11 Landfill Ownership/Operation for Major Texas Cities			
	Public / Public	Public / Private	Private / Private
Austin			●
Arlington		●	
Corpus Christi		●	
Dallas	●		
El Paso	●		
Fort Worth		●	
Garland	●		
San Antonio			●
Houston			●

Public vs. Private Ownership

Currently, the City relies completely on the private sector for disposal of waste at one of several landfills in the region. There are advantages and disadvantages associated with public versus private ownership of landfills. Table 6-12 analyzes public ownership.

Table 6-12 Public Ownership Advantages & Disadvantages	
Advantages	Disadvantages
<ul style="list-style-type: none"> ▪ Control over capacity ▪ Greater cost control in a less competitive overall landfill market as landfills close ▪ Revenue generation potential ▪ Ability to place additional waste management facilities at the site 	<ul style="list-style-type: none"> ▪ Environmental Risks ▪ Cost overruns ▪ Site selection process is highly political ▪ Capital cost requirements

Evaluate the potential for using existing landfill sites for material recovery options, including organics recovery and C&D recycling. At some landfills in the region, there is both C&D recycling and organics recovery. The SWMD should work with regional landfill owners to determine whether there are additional opportunities for using these sites for recovery of materials. Included in this recommendation is for the City to continue to explore options for using closed landfill sites for productive uses similar to the Sunnyside Landfill Solar Project (Figure 6-2).



Figure 6-2
Sunnyside Landfill Solar Project



Sunnyside Landfill Project: Few advances in landfill technologies are anticipated in the near to mid-term for the design, operation and closure of landfills. Some landfills in Texas, including closed landfills are installing photovoltaic solar systems as a cover option. This is a unique way of using land that is otherwise unsuitable for many other needs. The City of Houston has recently approved a project that involves placing solar panels over the closed Sunnyside Landfill. This project will ultimately generate 70 MW of electricity. The City can, through various policies, encourage other landfills or closed sites to develop these types of projects which would help achieve the City's Greenhouse Gas Emission reduction targets.

Collection Services

Providing efficient and reliable MSW, recyclables and brush and bulky waste collection is the core service that is provided by the SWMD. At a minimum, state law requires that the City provide once per week collection of MSW or require such frequency of collection by ordinance. In addition to these services the SWMD provides a number of other services that are described in Section 2.0 of this Plan

- The collection system needs to be **right-sized** to improve service efficiency and reliability. More routes need to be added to address Houston's unique characteristics. This will require more trucks and staff positions.
- The City's aging fleet is affecting program reliability and efficiency. Older trucks (beyond 7 years) create service reliability problems and increases the annual maintenance budget significantly.



- Staffing is an issue – in 2018, actual overtime costs for the SWMD staff were equivalent to 37.5 FTEs. A review of other cities shows that Houston staff serve almost twice as many households per staff member compared to other cities. The understaffing leads to significant overtime and high stress conditions.
- The City’s staff put in significant overtime hours to deal with Hurricane Harvey. With climate change, more frequent and severe storms can be expected.
- The Houston region has experienced several storm events in the recent past which have placed a significant burden on the City’s collection staff. In the past 20 years, over 11 major storm events and hurricanes have been recorded.
- The commercial sector is reliant on the private haulers for waste and recyclable material collection.
- Apartments are responsible for their collection. A growing percentage of Houstonians will rely on building owners for waste collection and recycling services.
- The City’s large area and land use patterns makes it difficult to efficiently collect waste from certain parts of the City. Some of the outlying areas might be better served through contracts with the private sector.

As part of the MATF Priorities workshop, MATF members were asked to evaluate the services that SWMD provides. The average scores are presented in Table 6-13, below. A 5 is the most favorable possible response. The results of the survey show generally positive marks for MSW, recyclable and yard and tree waste collection services. The MATF rated services associated with junk waste collection, Environmental Service Centers, public information programs, and illegal dumping in the lower half of the rating scale. Comments related to facility access both in terms of proximity and hours of operation were cited as factors for low scores. Illegal dump clean-up was rated as having the lowest performance of all SWMD services.

MATF Survey Question: *How would you rank the services provided by SWMD?*

Table 6-13 SWMD Performance Scores by the MATF	
SWMD Activity	5- Highest Performance 1-Lowest Performance
MSW Collection	4.3
Recycling Collection	3.0
Yard Waste Collection	3.1
Junk Waste Collection	2.6
Tree Waste Collection	3.0
Environmental Service Centers	2.4
Illegal Dumping Clean-up	1.6
Depositories, Recycling Centers	2.3
Public Information	2.3



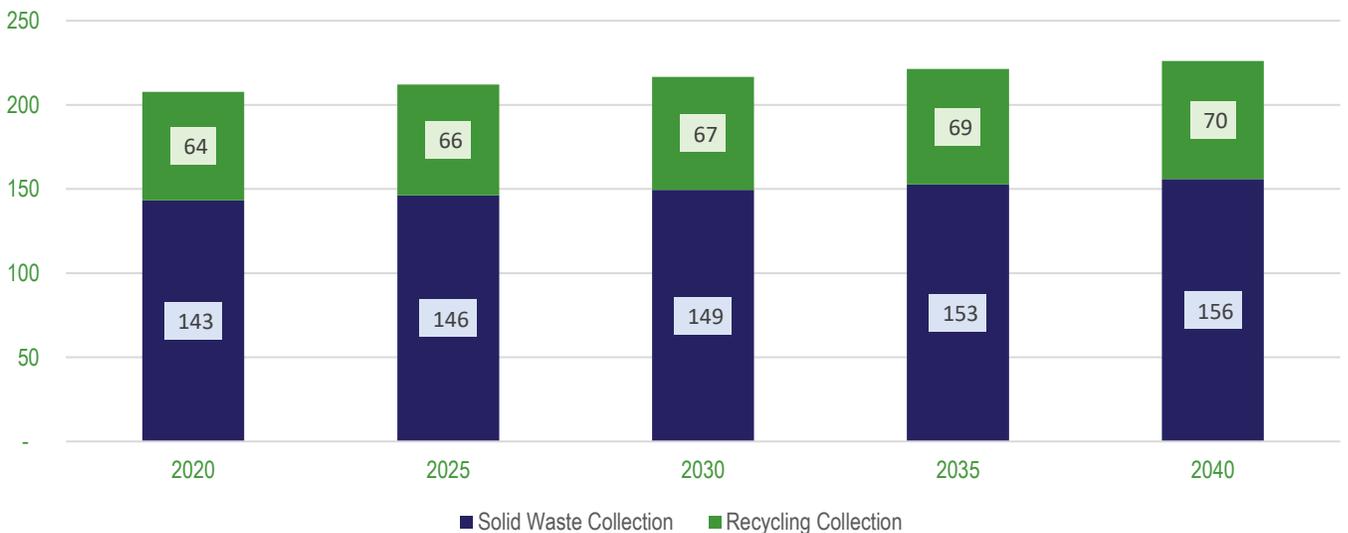
Collection Policy & Program Options

Provide efficient collection of MSW, recyclables, organics and brush/bulky waste. To improve collection efficiency, four things must happen: 1) Routing must be right-sized, 2) fleet of trucks that are used has to be upgraded, 3) staffing levels for collection must be commensurate with the right-sizing of routes and 4) fleet maintenance must be improved.

Program Right-Sizing: It is critical that the program be right-sized and operating with a modern fleet that can perform reliably. To accomplish this, the number of trucks and staff must be increased from its current levels and older trucks must be phased out on an accelerated basis. The phase-out should occur over several years so as not to create the need to replace a large number in any one year. Figure 6-3 shows the estimated number of trucks that will be required in future years for MSW collection and recyclable material collection.

In addition to right-sizing the fleet, the City must also replace older trucks on an accelerated basis in order to reduce maintenance costs. A review of maintenance records shows that the City is paying approximately \$1.0 million more in maintenance to keep older (more than 7 years) trucks in the fleet.

Figure 6-3 Projected Residential MSW & Recyclable Collection Vehicle Needs*
*assumes 70% vehicle availability



Implement data management program for collection fleet and provide management support to evaluate data for more efficient routing and accountability. The City currently has a contract for data management related to fleet activities. There have been implementation issues associated with this contract. The City should resolve these issues and put in place an active and dynamic data collection system that provides real-time data related to collection efficiency, recycling participation, traffic impacts, and other data.

Implement “Slow Down to Get Around.” In 2019, the Texas Legislature adopted HB 61 which was designed to enhance the safety of solid waste collection crews. This law requires drivers on Texas streets to treat solid waste collection crews in the same manner that they currently must treat emergency personnel and construction workers.



Transfer Station Policy Issues

Continuously evaluate alternative fuels and vehicle technologies including CNG and electric vehicles.

The City relies primarily on diesel fuel for its collection fleet (including residential collection, brush and bulky waste and illegal dump clean-up). There are communities in Texas and other cities that rely on compressed natural gas (CNG) to power their collection fleets. To implement a CNG or Electric Vehicle (EV) program, the City would have to: 1) invest in the fueling infrastructure; 2) invest in new trucks replacing older diesel trucks; 3) train Fleet Management how to maintain CNG or EV collection and support vehicles; 4) train collection staff to operate vehicles; and 5) monitor progress and look for additional opportunities.



Bay Area EV Garbage Truck

A 2016 MIT article estimates the cost of an EV garbage truck at approximately \$150,000 more expensive than a comparable diesel vehicle. With advances in technology and battery storage, these costs are anticipated to decrease over time.

Contract for the collection in areas outside the City's core beltway. One of the key factors affecting the efficiency of the SWMD collection fleet is the vast area where the City is responsible for providing collection service. To reduce the mileage on collection vehicles, some of the routes located in these areas should be consider for privatization. The contract would require that any hauler providing service to these areas match exactly the level of service that is provided by City crews.

Evaluate the potential for managed competition to reduce solid waste management costs for the City. Managed competition is defined as a process for determining whether certain City services can be out-sourced to the private sector. The managed competition process generally identifies specific areas, such as solid waste management, where the private sector is given the opportunity to compete against the City for identical services. This can include all or a portion of the services provided by the City. One of the challenges associated with managed competition is that the SWMD currently provides several services that are outside the normal collection of MSW and recyclables. Some of these services include: storm debris management, special event clean-ups, clean-up of homeless camp sites, dead animal collection and others. To reflect a valid cost comparison between the City and private-sector bidders, these costs must be segregated from the City's competitive bid.

A provision of the 2020 City of Houston Budget is for the City to fund a study to evaluate managed competition for both Solid Waste and Fleet Operations. The study began in December 2019 and the first phase is anticipated to be completed in 2020.

Transfer Stations

- A new contract for operation of the City's transfer stations was renegotiated in 2020 This contract will set the terms of payment, length of contract term, and other additional services including the addition of recyclable materials transfer capabilities.
- As the City grows and disposal costs increase in coming years, it is anticipated that the cost of disposing of MSW at the transfer stations will increase.
- The City will continue to balance the use of transfer stations versus direct haul of MSW to landfills – factors will include the costs of disposal at these facilities, haul cost savings, queue times at the transfer stations and landfills and additional wear and tear on trucks associated with using the landfill versus the transfer stations.



- Houston's traffic congestion, along with the City's growing area, will require the construction of new transfer stations in the future.
- Transfer stations will have to be more than just MSW disposal sites. Because the City will be increasing efforts to reduce MSW generation through increased recycling and organics management, transfer stations will be logical locations for the efficient hauling of recyclables and/or organics to processing facilities and markets.
- The Southwest Transfer Station has access issues that cause traffic and safety issues. The City should evaluate measures that can improve access into this facility.
- When evaluating sites for new transfer stations, both public and private entities must take into consideration environmental justice issues.
- The City is the owner of the three transfer stations it relies upon for a majority of the MSW collected. As the owner, the City is responsible for making capital improvements; the operator is responsible for maintaining the site and replacing equipment. In 2012 the City evaluated the three transfer stations. A total of \$8 million in site improvements was recommended. Because the facilities are 20 years old, the need to make on-going capital improvements will be necessary.
- There is a total of 13 transfer stations in the City of Houston with 19,625 tons per day throughput capacity in total; regionally there are 21 transfer stations. In 2017, a total of 2.3 million tons were processed in Houston transfer stations and 2.5 tons processed regionally.

Transfer Station Policy & Program Options

Negotiate a contract for the operation of the City's three transfer stations. The City owns three transfer stations. These transfer stations are essential to providing efficient collection of MSW by City crews. Services provided as part of the transfer station contracts include operation of the scale facility, operation and maintenance of the facility and hauling MSW from the transfer station to a permitted landfill. As owner, the City is responsible for any major structural repairs to the facilities.

Make necessary capital investments in the existing transfer stations. The City's three transfer stations were constructed approximately 20 years ago. While the City contracts for the operation of these facilities, the City is responsible for making any capital investments required to keep the facilities operational. One of the major transfer stations improvements that are recommended as part of this plan is to improve access to the Southwest Transfer Station. The entrance to this facility is from Westpark Drive. At times during peak hours of operation, trucks can back-up onto Westpark Drive causing traffic and safety concerns.

The City is in the process of designing a Northeast Transfer Station. Once designed the facility should be constructed and contracted out for operations. The City has determined that it is appropriate to plan, design and construct a fourth transfer station to be located at the Northeast Service Center at 5711 Neches Street. The design of this new transfer station should incorporate opportunities to process certain waste streams such as organics and other recyclables for future recovery at organics processors and the FCC facility.

Develop recyclable material transfer capabilities throughout the City, primarily at existing transfer station locations. Since March 2019, all materials recovered as part of the City's single stream recycling program have been directed to the FCC MRF. This requires that recyclable materials be transported from all sectors of the City to this one facility. Adding capability to transfer this material the way MSW is transported using transfer stations would decrease operating costs and improve program redundancy and efficiency. In the southwest quadrant, the City can use the Brittmore transfer station once its lease to Waste Management has expired.

Identify site locations and permit / construct two additional transfer stations. As the City continues to grow and traffic conditions remain an issue, there will be a need for additional transfer stations in the mid-to-long-term. The site selection of these additional transfer stations will have to take into consideration where the population is growing and the



location of landfills anticipated to be used in future years. If the City proceeds to develop its own landfill, it would be good planning to conduct siting for both the landfill and the transfer stations at the same time.

One of the options for securing long-term disposal capacity is through a rail-haul facility.

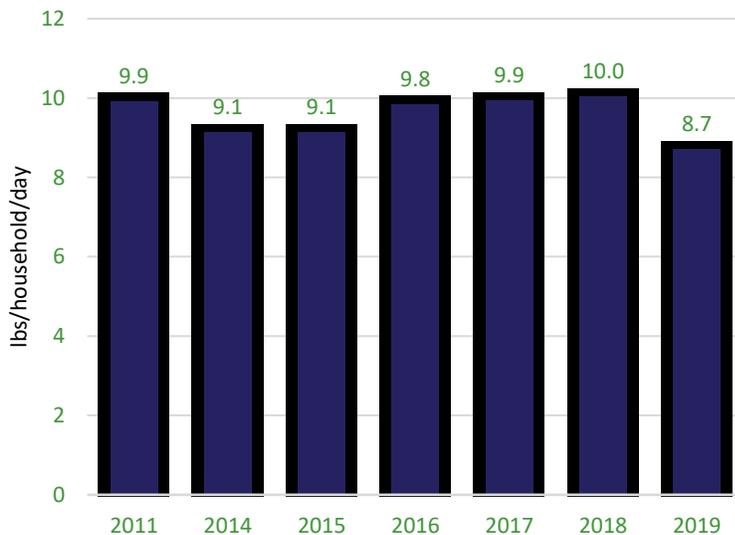
The Region’s landfills have approximately 30-40 years of remaining capacity. These are all privately owned and operated landfills. One potential way of securing long-term disposal capacity for the City’s waste stream is to haul MSW by rail to a remote landfill. Rail haul is used by major cities including Seattle, Chicago and New York. This is a capital-intensive process and one that requires contracts with rail companies and remote disposal sites, or with a private company to manage all aspects of rail haul. Some of the City’s current transfer stations are located along rail lines which may make this option feasible.



Source Reduction, Reuse, Recycling

Houstonians’ purchasing decisions, landscaping practices, and understanding of what is recyclable directly affect the cost of collecting, processing, and disposing waste. Figure 6-4 presents historic trends for residential waste disposal rates. This is the amount of waste that is collected by the City and taken to either a transfer station or landfill and includes both household trash and bulky waste. The average for the period 2014-2018 was 9.6 pounds per household per day (p/h/d). In FY 2019, the estimated disposal rate is 8.7 p/h/d versus 10.0 p/h/d in 2018. This 1.3 pound difference translates to 93,000 tons, or \$2.0 million in disposal fees. A comparison to other cities shows that a 3.8 p/h/d rate is possible, but requires significant investments in public information, mandatory programs, bans on disposal of certain materials and other policies and programs.

**Figure 6-4
Residential Waste Generation Rate**



A one pound reduction in the City’s overall per capita generation rate is equal to 766,000 tons per year; regionally, the same reduction is 1.8 million tons per year.

Waste minimization is the most cost-effective means of addressing the City’s waste management needs. Waste not generated does not have to be collected, transported, or disposed.

Table 6-14 presents a comparison of other Texas cities’ waste disposal rates for residential waste. Disposal rates are net of waste minimization, recycling, and organics recovery. It should be noted that the City of San Antonio provides bulky



waste collection only twice per year and allows residents to use one of four bulky waste collection centers. Fort Worth and Dallas provide once per month collection of bulky waste.

Table 6-14 Comparative Waste Disposal Rates					
City	Houston	San Antonio	Dallas	Fort Worth	Austin
Daily residential waste collected per household/week (Pounds)	6.2	5.9	5.6	6.0	3.5
Daily Bulky Waste/HH (Pounds)	2.7	0.5	3.0	0.6	0.3
Total	8.9*	6.4	8.6	6.6	3.8

***The difference between the 8.7 in Figure 6-4 and 8.9 in this Table is due to variances in reporting periods.**

Table 6-15 presents recycling rates for the residential sector for other cities. Houston’s program during this survey was impacted by Hurricane Harvey when the program was cancelled for several months. For 2019, the estimated recycling rate per household is anticipated to be 290 pounds per capita-day (p/cd).

Table 6-15 Recycling Performance in Other Cities					
City	Houston*	San Antonio	Dallas	Fort Worth	Austin
Annual Recyclables / HH (Pounds)	183	328	478	365	474
Mandatory Multi-family Recycling	No	Yes	Starts 2020	No	Yes

***In 2019, this is estimated to be 281.77**

Source: City Budget information

Table 6-16 shows the overall disposal rates presented on a regional basis. These data include waste from both the residential and commercial sectors. Table 6-16 results show the following:

- With the exception of 2018 (Hurricane Harvey), H-GAC is close to the state-wide per capita generation rate.
- The Austin and San Antonio regions generation rates are 85% of H-GAC.
- Hurricane Harvey’s impact is seen in the increase from 7.0 to 8.2 p/cd.



Table 6-16

Comparative Per-Capita Disposal Rates (2016-2018) (pounds)

Region	Houston – Galveston H-GAC	San Antonio AACOG	Dallas – Fort Worth NCTCOG	Austin CAPCOG	State Average
Per-capita Disposal Rates (2016)	7.08	6.20	7.89	5.98	6.83
Per-capita Disposal Rates (2017)	7.06	6.13	7.79	6.02	6.84
Per-capita Disposal Rates (2018)	8.24	5.65	7.59	5.95	7.22

Source: TCEQ MSW Annual Report 2018

Includes data from both MSW and C&D landfills

There are several variables that affect the waste generation and recycling rates, including the composition of the regional economy, storm events, types of local solid waste programs, and the amounts of waste that might be either imported or exported out of the region. **Even with these variables, however, it is clear from these tables that there are significant opportunities for the City and the region to extend landfill life through more aggressive waste minimization and recycling efforts.**

Key Waste Minimization, Reuse & Recycling Policy Issues

The City collects recyclable materials once every two weeks. The City uses the same type of truck (side loaders and sometimes rear loaders) it uses for solid waste collection to collect recyclable materials. Key issues related to collection include the following:

- Houston’s recycling diversion rate is low compared to other cities. An expanded public information campaign is needed to increase both the quantity and quality of materials. One of the reasons for this is that the other cities provide once-per-week collection of recyclable materials versus Houston where materials are collected every other week. While there are no empirical data available regarding recovery rates for once-per-week versus once every two weeks collection, analyzing the effect of collection frequency on recycling diversion rate is something the City may want to consider in the future. Increasing collection frequency will significantly increase collection costs.
- There are high levels of contamination in the materials that are collected as part of the residential recycling program (approximately 30-40%). This increases the cost of collection and processing.
- As participation rates in the recycling program increase, more trucks and staff must be directed to the recycling program. This may result in reductions in available garbage collection vehicles and staff.
- Through the agreement with FCC to process recycled materials, all recycled materials from each quadrant of the City must be delivered to this northeast Houston FCC materials recovery facility.
- In order to supplement City collection vehicles and crews, the City contracted for a private firm to provide recycling collection services in the northwest quadrant of the City. This is anticipated to be a short-term contract, with the City providing services as soon as fleet and staffing needs are addressed.
- Residents of multi-family households have limited access to recycling opportunities. Unlike Dallas, Austin and San Antonio, owners of multi-family complexes are not required to provide recycling services to their residents. This is an increasingly important issue as Houston’s population shifts to a greater percentage living in multi-family households.



- The value of recyclable markets has declined significantly over the past two years, in large part due to the loss of the China market for recycled materials. Market development was identified as a high priority action by the MATF. Lower values for recyclable materials may have an impact on private sector recycling.
- Sixty-eight percent of the City’s waste is generated by the commercial and industrial sectors. These sectors are also responsible for a large percent of what is currently recycled in Houston. To increase recycling significantly, this sector will need to achieve higher rates of recovery.

Waste Minimization, Reuse & Recycling Options

Expand education/promotion of source reduction, reuse and recycling for residents, including working with non-profits and private sector to leverage existing efforts. Because the primary role of local government is to focus on the down-stream (i.e. recovery) segment of a product’s lifecycle, the City is limited on how directly involved it can be on up-stream (i.e. manufacturing) and mid-stream (i.e. reuse/repurpose) segments of a product’s lifecycle. Generally, cities’ involvement focuses on expanding the promotion of waste prevention, reuse opportunities, and recycling right (reducing contamination). The City is involved in reuse through the Reuse Warehouse and chemical swap shop but is more directly involved in the recycling of materials through the existing recycling program. As part of the public information program, the City has, and should continue to work collaboratively with organizations such as State of Texas Alliance for Recycling, Keep Houston Beautiful and other environmental organizations.

Include more information regarding environmental impacts in City education materials, (i.e. upstream decisions for consumers). The City could include impacts in its education materials to convey the benefits of source reduction, reuse, and recycling. The City could include a “guideline for consumption” to explain the benefits of reusable water bottles, packing lunches in reusable containers, etc.

Lead by example through expanding the City purchasing / procurement guidelines to expand on source reduction, reuse, recycling requirements for City service and product providers. The City could create a sustainability purchasing team, perhaps through the Office of Sustainability in coordination with the Strategic Procurement Division, to develop an Environmentally Preferable Purchasing Guide (EPPG) to promote and encourage environmental stewardship across all City agencies.

Lead by example through expanding the City guidelines on source reduction, reuse, recycling efforts for all City agencies and offices. The City could expand existing guidelines for every City agency to participate in source reduction, reuse, and recycling efforts through an Administrative Procedure (AP) or policy provided to each office and agency, disseminated by the Mayor’s Office in coordination with the Office of Sustainability.

Develop Alternative Markets. The City could work with processors, Texas Commission on Environmental Quality (TCEQ), and the Mayor’s Office of Economic Development to determine whether reclaimers and/or end users could be attracted to the region to accept more types of recyclables in the City’s program, and expand on current local markets where possible. Working with the Office of Economic Development, the City could determine whether tax abatement or

**Market Development –
Senate Bill 649**

Senate Bill 649 relating to the promotion of the use of recyclable materials as feedstock for processing and manufacturing was filed during the 86th Legislative Session and took effect on September 1, 2019. This bill mandates researching methods to encourage the use of recyclables as inputs for the creation of new products, which is part of a larger plan to invest in, expand, and promote the state’s recycling economy. The State of Texas Alliance for Recycling (STAR) was a driving force behind the legislation, with its Business Council members conducting active advocacy. This legislation requires TCEQ to examine the current recycling economy and take specific actions to develop markets.



other incentives could be provided to encourage more public/private partnerships similar to the City's current processing agreement with FCC.

Add more drop off locations for recyclables, chemicals, and electronics. In order to make recycling and reuse more convenient for the residents of Houston, the City could increase the number of drop off locations currently available. Currently, there are 6 drop-off locations, five additional facilities would be required to place one in each City Council district.

Add more collection events for household hazardous wastes. Currently, Houston offers HHW collection at the Westpark Consumer Recycling Center and each of the Environmental Service Centers. The City could increase the frequency of these events to three times per year. As part of advertising for these events, the City could stress the significance of lithium battery contamination in the garbage and recycling streams and the importance of properly handling lithium batteries.

Expand types of materials collected and reused in City-operated reuse of materials beyond current building materials, electronics, and chemicals. In conjunction with adding more collection events for HHW efforts described above, if certain items seem better suited to add to the City's reuse centers, add the items. Reuse centers would need to have space to accommodate additional materials and potential recipients of the added materials should be identified prior to adding materials.

Add additional materials to recycling programs (e.g. textiles)

The City could continue to work with FCC to determine what and when materials could be added to the curbside recycling program. The City could also work with American Textile Recycling Service (ATRS), Green City Recycler, or other private companies and non-profits to determine the viability of expanding items that can be dropped off at Environmental Service Centers or Neighborhood Depositories for reuse or recycling, such as textiles.

Adopt a mandatory residential recycling ordinance, with strict code enforcement to issue citations for placing recyclables in garbage containers. Providing mandatory recycling services via ordinance requiring residents to participate in curbside recycling would increase recycling participation and disposal diversion in the City. The establishment of a mandatory recycling ordinance would require the drafting of the ordinance language (likely revising Chapter 39 of the City's Code of Ordinances), and the passing of the ordinance revisions by the City Council. The ordinance would require participation and could include banning materials from garbage containers.

Use Code Enforcement at the curb to issue citations for contamination in recycling containers and instruct collection vehicle operators to leave the recycling container unemptied if tagged for contamination. Code Enforcement Officers could check recycling carts for contamination, and tag contaminated carts. Collection personnel would be instructed to not collect from tagged carts. Ordinance revisions would be necessary to codify the procedure (i.e. modify Chapter 39). Education and outreach ahead of enforcement should be conducted to notify residents of the change in procedure.

City of Dallas typically holds 10 Batteries, Oil, Paint and Antifreeze recycling (BOPA) events per year, and City of San Antonio, in addition to their HHW collection facility, typically has 3 mobile collection events per year.



San Antonio Enforcement

- San Antonio has 34 dedicated Solid Waste Route Inspectors (total population of 1.5 million)
- From SA FY 2018 Annual Report: Achieved 36% Recycling performance rate (performance rate is determined by not only including all of the materials recycled, but also adding the correct material).
- Improved contamination rate from 26% to 20.6%. Green organics contamination went from 43% rejection rate to 22%. In 2008 an average of 1.4 tons per residence sent to landfill, now down to 1 ton.
- Revenue from fines used to offset cost of redirecting waste. FY 2016: Purchase of 5 pickup trucks for new inspectors- \$105,000
- Lower contamination rates lead to more efficient recycling routes because contaminated loads don't have to be taken to landfill.
- The Solid Waste Management Department has an inspection team checking the blue bins. The team will document unacceptable items and place a hang tag on the cart, indicating that it won't be picked up until the trash is removed. After a warning, if the inspection team finds more trash, it could result in a \$25 fine.
- From the 2018 Solid Waste Annual Report: 46,924 warnings were issued, 1,730 fines issued. $1,730 \times \$25 = \$43,250$.
- Improved resident knowledge of acceptable recycling materials; inspectors act as ambassadors to the community.

Implement a Pay-as-You-Throw curbside collection system where setting out more garbage costs more, setting out less garbage costs less. In pay-as-you-throw (PAYT) programs, also known as unit pricing or variable-rate pricing, residents are charged for the collection of garbage based on the amount they throw away, which more closely aligns with how other utilities are charged. There are different approaches to PAYT, including variable rate carts based on size of the cart, stickers or tags residents must purchase to place on garbage bags, or specially marked or colored bags residents must purchase in which to set out garbage. A critical factor in designing PAYT is the need to purchase additional carts ahead of normal replacement schedules. PAYT systems generally only work when there is a fee charged for services provided.

Implement a voluntary technical assistance program to assist multi-family complexes in setting up on-site recycling programs. For multifamily complexes that wish to implement or improve upon recycling accessibility, the City could initiate a technical assistance program, based upon request. Targeting multifamily complexes within the technical assistance program would require that audits be performed by City staff to identify space constraints and other impediments to recycling and provide solutions to the property manager to overcome the impediments.

Adopt a mandatory recycling ordinance for multi-family complexes, with phased in compliance (education, then strict compliance). Mandating recycling services via ordinance requiring multifamily complexes to participate in recycling would increase recycling participation and disposal diversion in the City. The establishment of a Mandatory Recycling Ordinance (MRO) for the City would require the drafting of the ordinance, and the passing of the ordinance by the City Council. Cities in Texas who have already passed MRO's include San Antonio, Austin, Dallas, and San Marcos.



San Antonio Monthly Rate Structure
(Does not include Environmental Service Fee)



The City could include a requirement for a permit for haulers specifically for collecting recyclables from multi-family complexes (see Dallas details shown below), which would provide an opportunity for the City to track which complexes are complying with the ordinance, as well as tons collected from multifamily complexes.

Dallas Multi-Family Recycling Ordinance

- Half of Dallas residents live in multifamily housing.
- The [City of Dallas Multifamily Recycling Ordinance](#) requires multi-tenant property owners/managers offer **access to either valet, dual stream, or single stream recycling service** for their tenants. The ordinance applies to properties with 8 or more units.
- Ordinance will go into effect on **January 1, 2020**.
- In addition to offering access to recycling service, property owners and managers must **use a permitted recycling collector for recycling collection service**. (Permitted Recycling Collectors submit annual reports).

Implement a voluntary technical assistance program to assist businesses in setting up on-site recycling programs. Similar to the technical assistance program for multifamily complexes described above, the City could implement a technical assistance program targeting business entities to help businesses identify and reduce unnecessary physical waste. Specifically, the program could evaluate collection and disposal of trash, recycling, organics, and disposal of regulated wastes (including chemicals and electronics).

Adopt a mandatory recycling ordinance for businesses, with phased in compliance (education, then strict enforcement). Mandating recycling services via ordinance requiring businesses to participate in recycling would increase recycling participation and disposal diversion in the City. The establishment of a Mandatory Recycling Ordinance (MRO) for the City would require the drafting of the ordinance, and the passing of the ordinance by the City Council.



Private Sector Partnerships

The commercial sector is taking the lead on several fronts related to changing products and encouraging recycling. Corporate resources should be included as a key resource in implementing Houston's Plan. For example, **Walmart** has recently announced "zero waste" initiatives and Coca-Cola has committed to collecting and recycling its packaging, as well as increasing bottles to 50% recycled plastic by 2020. Unilever also states that their goal is "to move towards a more circular economy, designing products so that more packaging either remains in loops or has the best possible opportunity to be recycled".

Furthermore, **Amazon** has invested \$10 million in the Closed Loop Fund, intended to fund large retail and consumer goods companies in building infrastructure that will increase product and packaging recycling, with the intention of ensuring that material is returned to the manufacturing supply chain. It is also Amazon's intention to increase the availability of curbside recycling for 3 million homes in the United States, wherein 1 million tons of recyclable material will be diverted from landfills.

Building upon the circular economy initiatives described in Section XX, in May 2018, the **American Chemistry Council's (ACC) Plastics Division** announced committing to the following goals for capturing, recycling, and recovering plastics:

- 100% of plastics packaging is re-used, recycled, or recovered by 2040.
- 100% of plastics packaging is recyclable or recoverable by 2030.
- 100% of the U.S. manufacturing sites operated by ACC's Plastics Division members will participate in Operation Clean Sweep-Blue by 2020, with all of their manufacturing sites across North America involved by 2022.

In order to do this, ACC recommends moving to a more circular economy which "prioritizes the extension of product life cycles, extracting maximum value from resources in use, and then recovering materials at the end of their service life."¹ U.S. plastic resin producers partnering with the ACC plan to focus their attention on the following key areas in order to achieve the goals outlined above:

- Designing new products for greater efficiency, recycling, and reuse;
- Developing new technologies and systems for collecting, sorting, recycling, and recovering materials;
- Making it easier for more consumers to participate in recycling and recovery programs;
- Expanding the types of plastics collected and repurposed;
- Aligning products with key end markets;
- Expanding awareness that used plastics are valuable resources and available for next use.

Establish more informative data management systems to better track trends and provide more transparent and useful data. The City currently maintains data relating to solid waste management across multiple systems and reporting mechanisms, making it difficult to identify system-wide trends, threats and opportunities.

Implement reporting requirements to better track private sector recycling. City Code of Ordinance Chapter 38 states "solid waste operators" must have a "franchise," but the current language is not clear if "solid waste operators" includes recyclables haulers. Chapter 38 could be revised to clarify (or add) recyclables haulers to be included in the requirement for a franchise and require annual renewals of the franchise. The language could also be revised to require that franchise holders provide the City with certain information on a quarterly basis that would at least include tons of recyclables collected and delivered to a processor within the City. The reporting could include number of customers, by type of customers (multi-family or commercial), tons collected, tons processed and marketed, and contamination rates.



Organics

Approximately 35% of the total waste stream is organic material, including food waste, yard trimmings and wood. An additional 25% is paper and paper products which can also be composted. The City's current collection program is designed to first reduce the amounts of yard waste and food waste generated. The City provides separate collection of tree waste every two months (39,157 tons in 2017 and 21,215 tons in 2018). The City provides collection of yard waste in specifically approved biodegradable bags once per week (15,412 tons in 2017 and 9,317 tons in 2018).

Organics Policy Issues

- Biosolids have been identified as a difficult waste to manage at landfills, even though they do not take up a large amount of landfill space. This material can be composted; however, there are few compost facilities in the region that are permitted to accept this material.
- Adding biosolids and food residuals at composting facilities may increase the total capacity of processing facilities; however, few processors are currently authorized or willing to accept it.
- There are opportunities to recover more food waste to be used to feed the hungry. It requires significant coordination and there are agencies that have, as their mission, to make these efforts more productive.
- Houston has a number of food related industries that generate wastes that can be composted versus disposed in landfills.
- Opportunities exist for collection of food residuals from commercial sector; this may require new facilities or existing facilities' permits to be upgraded.
- Post-consumer food residuals are often highly contaminated, especially when collected from the residential sector.



Organics Policy & Program Options

Continue to provide both yard waste and tree waste collection services to residents. The City currently provides once per week collection of yard waste in biodegradable plastic bags. Tree waste is collected every other month. This program is responsible for the collection of approximately half of the material the City currently diverts from area landfills. One of the challenges with this program is the amount of contamination that appears in the tree waste program specifically. Residents often place bulky waste in the tree waste piles. To address this, the City needs to address this issue in their overall public education and enforcement programs.

Encourage greater recovery of acceptable food wastes for feeding low-income residents. EPA's priorities for managing food wastes identify donations of acceptable food waste second to source reduction as a priority. There are a variety of programs throughout Houston which are designed to reduce food waste by directing acceptable food waste for feeding the hungry. The City should be more proactive in doing more to connect generators of food waste with programs such as the Houston Food Bank and others to put this waste to positive use.

Adopt a mandatory recycling ordinance for organics collection with phased in compliance (education followed by enforcement.) The early focus of this strategy is to enforce compliance with current ordinances related to keeping yard waste out of solid waste collection bins and following rules related to tree waste set-out. If the City were to eventually move to residential food waste collection, proper set-out of this material will have to be included in the program.

Encourage diversion from the landfill of biosolids generated at City wastewater treatment plants to processing facilities. Work with organics processors to identify additional available processing capacity for biosolids among the facilities that are currently authorized to accept it. Identify feasibility of expanding capacity at those facilities if appropriate.



Provide greater support and expand availability of Master Composter program to build support of organics diversion and for public education. The City currently trains Master Composters through a program maintained by the State of Texas Alliance for Recycling (STAR). The City of Houston should expand its program to train Master Composters by making training sessions more accessible to the public and holding training sessions more often.

Community Level Composting: A promising trend developing in Houston and elsewhere is composting at the community level. Such programs are typically subscription based and may serve residences – both single-family and multi-family – and small businesses. These programs are typically quite small, particularly at start-up, but they are known for collecting organics with very little, if any contamination. They may process their own compost or deliver to third-party composters. They may be linked to small, community gardens who compost at the back-yard scale at the garden where compost is used. These “boutique” collection and processing operations currently fulfill an important niche in the management of organics because they are able to respond to the public demand for food residual diversion when City-wide diversion programs are not available or not feasible.

Encourage use of locally produced compost, mulch and soil blends outside City Projects. One way to encourage use of locally produced organic products outside of City projects is to include preferences for use of such products in a “Green Building Code” as addressed regarding recycling and resource recovery. This program could be phased with the phasing in of a “Green Building Code.”

Lead by example by encouraging use of locally produced compost, mulch and soil blends at City projects and facilities. Institute and enforce a procurement policy favoring locally produced compost, mulch and soil blends at new and existing City projects and facilities. Coordinate with development of Environmentally Preferable Purchasing Guide for other recyclables.

Increase drop-off locations for acceptance of organics including yard waste, brush and tree waste. This action relates to the proposed actions in the recycling and illegal dumping programs to increase greater accessibility of depositories for materials to be properly disposed. There are currently 6 of these facilities – another 5 would place one in each council district.

Initiate Residential Food Waste Collection. Food waste could be collected from single-family residences along with green waste. Green waste is currently collected in compostable plastic bags. Comingled food waste and green waste are typically collected in carts. Introducing an additional cart in the residential collection system would be expensive. In addition, contamination is typically very high in post-consumer food waste, which increases cost and decreases the ability to process it. Most of the organics processors in the region will not accept post-consumer food waste.



Continue to monitor new technologies and processes for managing organic waste streams. There are technologies that are currently available for processing organics in a more complex manner than traditional windrow composting. These technologies have the potential to reduce more waste and different types of material more efficiently and more environmentally acceptable. However, the cost of such options is significantly more expensive than current regional practices.

On the Horizon – Edmonton Anaerobic Digestion Facility

This facility, located at the Edmonton Waste Management Centre (Calgary Canada), will expand the City's organics waste processing capacity and contribute to the goal of diverting 90% of waste from landfill.

The ADF will enable the City to:

- Process up to 48,000 tons of organic waste per year and divert it from landfill;
- Create renewable energy in the form of electricity and heat;
- Produce high quality compost for use in agriculture and horticulture;
- Reduce greenhouse gas emissions; and
- Remove odors created during the process by using bio-filters.

The construction of the new ADF is now complete. The facility is currently in the commissioning phase, processing organic feed stock from municipal solid waste and generating biogas. It will be fully operational later in 2019. Source: https://www.edmonton.ca/projects_plans/waste_drainage/anaerobic-digestion-facility.aspx

Figure 6-5 Edmonton Resource Recovery Facility





Energy and Resource Recovery

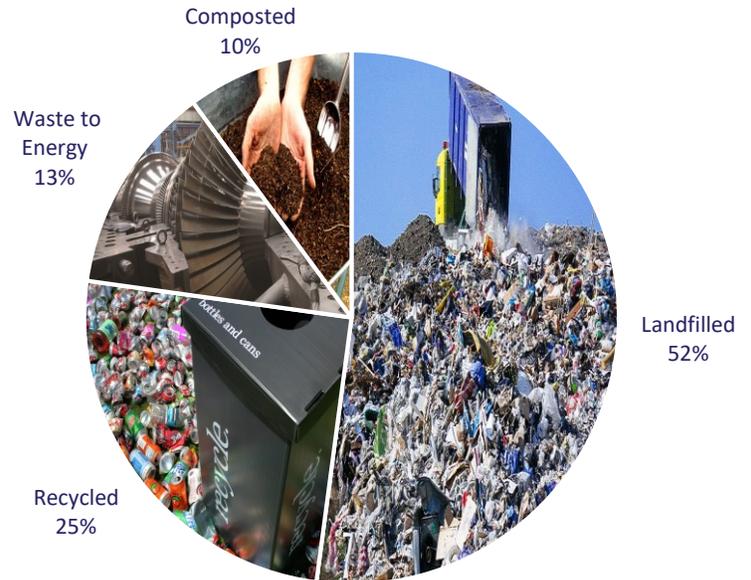
Energy & Resource Recovery Policy Issues

Energy recovery from waste has been demonstrated in the U.S. and other countries around the world. According to the U.S. Energy Information Agency, 12.8% of the MSW in the U.S. is burned for energy recovery. Demonstrated technologies include both mass burn and refuse derived fuels, which combust waste for energy recovery in the form of either steam or electricity. There are no operating waste-to-energy facilities operating in Texas.

With these technologies there are significant financial investments required. For example, a 2,000 ton-per-day facility could cost approximately **\$200 - \$250 million to construct**. Operating costs (including debt service) are in the range of \$75 to \$100 per ton, compared to current landfill tipping fees in Texas which are between \$25 and \$30 per ton. There are also air quality issues and other environmental issues that must be addressed prior to implementation of energy recovery technologies.

Technologies such as pyrolysis and gasification can recover energy in a more environmentally acceptable manner. The major risk associated with these technologies is that most of these technologies are relatively new and there are operational concerns. A major concern with adoption of these technologies is the need to have a fairly homogenous waste stream sent to the facility. Energy recovery technologies must compete with other energy alternatives including relatively low-cost natural gas. Table 6-17 presents a summary of characteristics of pyrolysis, gasification and anaerobic digestion.

Figure 6-6
Waste Management in the US



Source: U.S. Energy Information Agency



Table 6-17 Characteristics of Pyrolysis, Gasification & Anaerobic Digestion			
Conversion Technology	Pyrolysis	Gasification	Anaerobic Digestion
Feedstock	Plastics	MSW	Organic wastes
Primary End Product(s)	Synthetic Oil, Petroleum Oil	Syngas, Electricity, Ethanol	Biogas and Electricity
Conversion Efficiency	62 – 85%	69 – 82%	60 – 75%
Facility Size (capacity)	10 – 30 tons per day	75 – 330 tons per day	100 – 1000 tons per day
Product Energy Value	15,000 – 19,000 Btu/lb	11,500 – 18,800 Btu/lb	6000 – 7000 Btu/lb

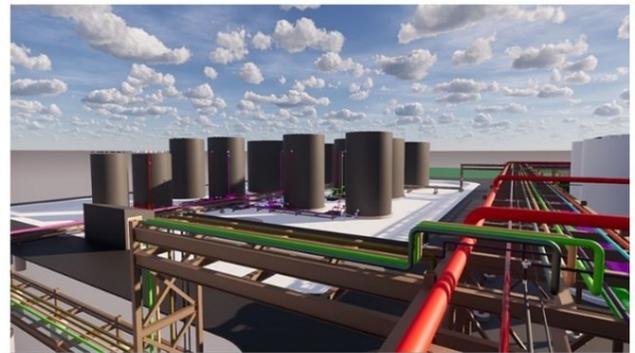
Source: U.S. Environmental Protection Agency

There are a number of private entities across the U.S. that are investing in alternative technologies. The American Chemistry Council references a report completed by Closed Loop Partners (CLP), an organization that invests in the development of a circular economy. The report concludes the following, “Our analysis indicates that these technologies could meet an addressable market with potential revenue opportunities of \$120 billion in the United States and Canada alone. CLP identified 60 technology providers with significant potential for growth, along with 250 investors and strategic partners engaged with them.”

Energy and Resource Recovery Program Options

Promote landfill gas recovery for energy recovery. The City should use its contractual leverage whenever possible to have landfills recover landfill gas for energy recovery. This technology is being used in the H-GAC region and involves capturing the gas generated from the decomposition of organic material in the waste and either using it to generate electricity on site or converting it to pipeline quality gas. Section 6 includes a listing of landfills that are currently recovering energy from landfills. These include the three primarily MSW landfills used by the City of Houston (McCarty, Blue Ridge and Atascocita).

Periodically evaluate resource recovery and energy-from-waste technologies to determine if it is appropriate for Houston to invest in such technologies for waste management. There are technologies currently available for converting waste to energy; however, these technologies are costly and pose certain environmental risks. New technologies such as pyrolysis, gasification and anaerobic digestion may provide the City with long-term options for significantly reducing landfill needs.



Rendering of the Ashley, Indiana facility. Courtesy of Brightmark Energy

Figure 6-7
Brightmark Plastics Pyrolysis Facility is located in Ashley, Indiana The advanced plastics renewal facility, now under construction, will divert 100,000 tons of plastic waste each year from landfills and incinerators and convert it into 18 million gallons of ultra-low sulfur diesel fuel and naphtha blend stocks and 5 million gallons of wax. Phase one of the plant’s construction will represent a \$138.3M capital investment in Steuben County, Indiana. Source: Brightmark Energy (2019).

Currently, Brightmark is seeking proposals from cities to locate a facility in their jurisdiction.



Conduct periodic industry roundtable meetings. The Houston area is a world leader in energy related businesses. Some of these businesses have a direct influence on the development of alternative waste technologies, especially related to plastic production and waste management. The SWMD should establish a business roundtable to periodically review the potential of new technologies and encourage private investment.

Illegal Dumping

Illegal Dumping Police and Program Options

The City of Houston has hundreds of illegal dump sites located throughout the City. A number of agencies are responsible for detecting, monitoring and prosecuting illegal dumping in Houston, including the Harris County Environmental Crimes Unit, Houston Police Department (HPD), the Houston Department of Neighborhoods and SWMD. SWMD's primary role is to collect and properly dispose of the illegally dumped material once it has been reported.

Increase the number of crews and provide additional equipment for increased response to illegal dumping sites. In order to be more responsive to citizen complaints regarding illegal dump sites, the City should dedicate staff and equipment to the illegal dumping collection program. Each of the 4 districts should maintain at least two crews dedicated to illegal dump collections.



The MATF identified collection of illegal dump sites as one of its key priority issues.

Photo Source: Houston Chronicle

Increase hours of operation at existing depositories and add new depositories. In order to encourage proper disposal of MSW, the City should increase the hours of operation of the existing depositories. It is recommended that there be a depository located in each City Council district. This would require the construction and operation of 5 additional depositories.

Increase staffing for camera monitoring program – increase number of sites where cameras are located. The HPD and Harris County maintain a current program of monitoring known sites where illegal dumping is taking place. Monitoring is designed to deter individuals from illegal dumping and to assist in identifying individuals responsible for the illegal dumping. It is recommended that the number of these sites be increased.

Public Education Program related to illegal dumping. Develop and implement a public information campaign designed to reduce illegal dumping as well as how to report illegal dumping activities. The campaign should utilize a range of media, including social media, news articles and public service announcements targeted to the diverse cultures and languages in Houston.

Define responsibilities for illegal dumping between the Department of Neighborhoods and the HPD Differential Response Units. The Houston Police Department has Differential Response Teams who perform community policing using both traditional and non-traditional policing methods to address community crime. However, the Police Department does not accept responsibility for addressing illegal dumping using this unit. Therefore, the Department of Neighborhoods is currently taking 311 calls and addressing the issue.

Improve enforcement through broader powers for Code Enforcement and Solid Waste Management staff related to illegal dumping. The Harris County environmental Crimes Unit and the Houston Police Department Environmental Enforcement Unit report illegal dumping activity of more than 5 pounds to the District Attorney. Given the limited resources available to HPD, it is advised the Code Enforcement and Solid Waste staff be given the authority to issue citations for



illegal dumping. The City should also develop a process for accelerated enforcement of illegal dumping ordinances. Often, current court cases related to illegal dumping take between 2 and 4 years to resolve. By this time, the illegal dumping is typically cleaned-up and courts often do not enforce penalties.