



ORGANIC WASTE:
Residential collection increased, but
challenges remain in larger commercial sector

April 2014

LaVonne Griffin-Valade
City Auditor

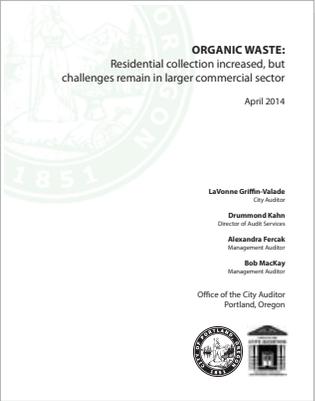
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CITY OF PORTLAND

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April 8, 2014

TO: Mayor Charlie Hales
Commissioner Nick Fish
Commissioner Amanda Fritz
Commissioner Steve Novick
Commissioner Dan Saltzman
Susan Anderson, Director, BPS

SUBJECT: Audit Report – *Organic Waste: Residential collection increased, but challenges remain in larger commercial sector* (Report #447)

The attached report contains the results of our audit of the Bureau of Planning and Sustainability's (BPS) Solid Waste Program in achieving its goals to reduce the amount of waste generated citywide and to increase the percentage of residential and commercial waste that is recycled.

We found that the Solid Waste Program is on the way to increasing the recycling of garbage, but further efforts are required to reach its broader goal of reducing overall waste generation. Specifically, there has been success in reducing waste sent to landfills in the residential sector, and residents appear to be adjusting to changes in the collection of garbage, recycling, and organic waste. However, the commercial sector generates the vast majority of organic waste, and much of it ends up in landfills.

The audit recommends that BPS increase the food waste participation rate for the commercial sector, including multifamily housing units, and identify clear incentives for businesses to divert food waste from the landfill. We also recommend the Bureau work on identifying and implementing prevention strategies to reduce total waste generated for both the residential and commercial sectors.

We ask that BPS provide us with a status report within one year detailing actions taken to implement the audit recommendations. We appreciate the cooperation and assistance we received from management and staff at BPS.

LaVonne Griffin-Valade
City Auditor

Audit Team: Drummond Kahn
Alexandra Fercak
Bob MacKay

Attachment

ORGANIC WASTE:

Residential collection increased, but challenges remain in larger commercial sector

Summary

We conducted this audit to determine the status of the City's Solid Waste Program in achieving its goal to reduce the overall waste generated and to recover an increasing percentage of both residential and commercial waste in Portland. Our audit also focused on the impact of 2012 service changes introduced with the curbside food waste collection program and every-other-week garbage collection.

We found that the Solid Waste Program is on the way to achieving its stated goals to increase the City's waste recovery rate, but further attention is required to achieve its broader goals of reducing overall waste generation. Specifically, there has been success in reducing waste sent to the landfill in the residential sector, and residents appear to be adjusting to the changes in services. However, the commercial sector generates the majority of organic waste, and much of it ends up in the landfill. For the purpose of this report, organics refers to food scraps and yard debris.

We recommend the Bureau of Planning and Sustainability:

- Increase the food waste participation rate for the commercial sector, including multifamily housing units. Identify clear incentives for businesses to divert food waste from the landfill.
- Continue working on identifying and implementing waste prevention strategies to reduce total waste generated for both the residential and commercial sectors.

Background

In 1983, the Oregon Legislature mandated that every community in the state provide the opportunity to recycle waste and design a recycling system. In 1987, the City of Portland established its first such system, requiring all garbage haulers to offer recycling services to their customers. In addition, state law prohibited haulers from charging higher fees for recycling than for garbage collection.

Recycling services were followed by the implementation of the Portland Composts! Program in 2005, when the city required every waste collection company to offer commercial composting services to collect food waste. Participation in the 2005 compost program was voluntary.

The City outlined its consumption and solid waste goals in the 2009 Climate Action Plan. This plan was a collaboration between the City of Portland and Multnomah County to develop a climate action strategy to achieve a 40 percent reduction in carbon emissions by 2030 and an 80 percent reduction by 2050 from the 1990 level. The solid waste related objectives included in the plan for 2030 are to:

- Reduce total waste generated by 25 percent from 2009 level
- Recover 90 percent of all waste generated

Appendix A of this report contains the Consumption and Solid Waste objectives and action steps listed in the Climate Action Plan.

The City of Portland shares waste collection responsibilities with the Metro regional government, which operates the regional transfer facilities that process solid waste. The City participates in the implementation of the regional waste management plan, and works directly with customers and waste collection companies to regulate and manage the system in the city's urban boundary. Figure 1 outlines responsibilities in Portland's waste management system.

Figure 1 Roles and responsibilities in Portland’s solid waste management system

Resident	City	Hauler	Metro
Prepare and sort items into appropriate carts	Grant and monitor residential collection franchises	Provide collection service to customers	Create regional waste management plan
Place carts at curbside on designated pick-up day	Regulate residential curbside and commercial collection systems	Provide and replace carts for service	Operate regional transfer facilities where solid waste is processed for delivery to landfills and other facilities
Remove carts from curbside after waste is collected	Provide education and outreach to residential and commercial customers	Leave notices for customers when there is noticeable contamination/did not follow proper preparation	Collect solid waste fees and taxes to fund operations and distribute funds for waste reduction efforts to cities in the region
Notify hauler of problems with service or billing errors	Answer/resolve customer questions and complaints, including enforcement of Administrative Rules	Answer/resolve customer questions and complaints	Provide information to public on hard-to-recycle items through Recycling Information Center
Pay hauler for service	Set rates for residential customers*	Deliver loads to transfer facilities	

Source: Bureau of Planning and Sustainability Administrative Rules, and Metro audit report - *Organic Waste Program: Re-examine cost-effectiveness and adjust efforts if needed* October 2013

* See audit report #429 – *Residential Solid Waste: Customer rates accurate, but monitoring should continue*, June 2012

The City’s Bureau of Planning & Sustainability (BPS) is responsible for providing solid waste collection and education services to the residents and businesses located within the Portland urban service boundary. BPS, directed by City Council, sets residential waste collection rates, manages the residential waste collection franchises for private sector waste companies, and implements policies to reduce waste and increase recycling and organic waste recovery rates. The total waste generated by the City is defined as waste consisting of (1) materials diverted for recycling, (2) organic waste – food scraps and yard debris – diverted for composting and (3) waste sent to the landfill.

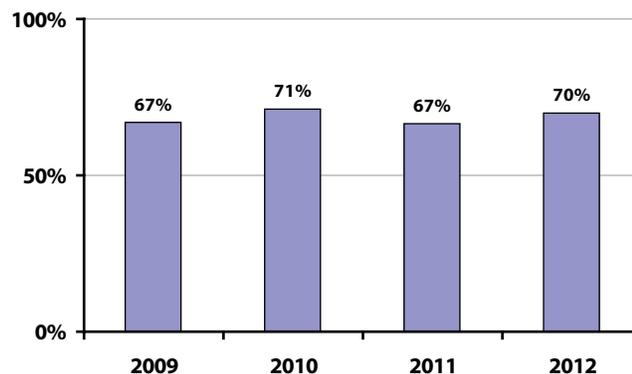
The Bureau manages waste collection franchises for the residential sector. The commercial sector, including multifamily housing with five or more units, does not use franchised haulers and accounts for 75 percent of total waste collected. Commercial waste collection services are regulated by the Bureau through a permit system. Requirements for private haulers and businesses include establishment of recycling and composting programs, but the collection services are not franchised and rates are not set by City Council. Each commercial enterprise, including factories, restaurants, and hotels, can select their own hauler and negotiate their own rates, and multiple haulers can service an area on different days. Residential areas each have one franchised hauler, designated by City Council and serving all of the residences in its franchised area.

Food waste collection and composting as a landfill waste reduction strategy

The City's Waste Reduction & Recycling program uses various strategies to reduce landfill-bound waste and increase the recycling and organics recovery rates in the residential and commercial sectors.

The 2007 Portland Recycles! Plan outlines specific steps and strategies to achieve the goal of recovering 75 percent of waste generated by 2015 (See Appendix B for a complete list of goals and steps). The recovery rate is calculated by adding recycled material and organics and dividing it by total waste generated. Between 2009 and 2012, the City raised the recovery rate from 67 percent to 70 percent.

Figure 2 Citywide recovery rate*



* Recovery rate = recycling plus organics divided by total solid waste plus 6% DEQ credit

Source: Bureau of Planning and Sustainability

According to the Bureau, providing food waste collection services and giving residents and businesses the option to prevent food waste from going to landfills is an important part of the overall waste reduction strategy. Specifically, the steps called for in the Portland Recycles! Plan are weekly curbside collection of food scraps and every-other-week collection of landfill bound garbage for the residential sector.

On October 31, 2011, the City of Portland began a new curbside food collection service, which allowed residents to include food scraps with yard debris. At the same time, the City reduced landfill bound garbage pick up to every other week. This new food collection service is offered to single-family homes and small multiplexes with two to four units. Larger multi-unit apartment buildings are part of the commercial sector services. Commercial haulers are required to provide food collection services, but commercial customers can choose not to participate.

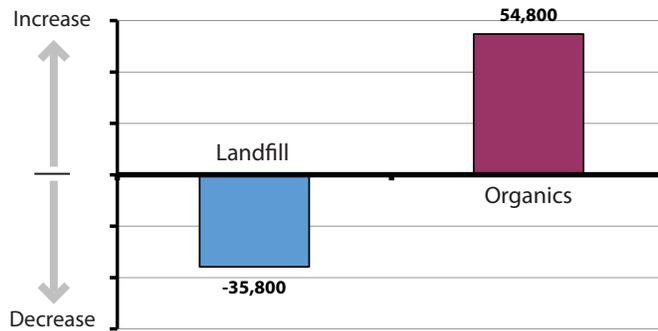
When the food collection service was introduced in 2011, the Bureau conducted a customer education campaign, including door-to-door outreach, to inform residents of the new service. The Bureau also set up a customer call center to handle the increase in calls from residents.

Audit Results

Success reducing residential landfill waste and increasing residential organic waste, but total curbside waste is increasing

The year after the curbside food collection program was introduced in 2011, the residential sector saw a decrease in waste going to landfills and an increase in organic waste collected for composting. Once the City implemented the residential food collection program, garbage collection was reduced to every other week and food scraps were combined with yard debris in a weekly service. Waste sent to landfills was down 38 percent in 2012 from the previous year. In addition, the amount of organic waste collected was nearly three times the amount collected the prior year. Figure 3 shows the change in tons of landfill waste and organic waste collected for the years before and after implementation of curbside food collection.

Figure 3 Difference in residential tons collected
(between 2011 and 2012)*

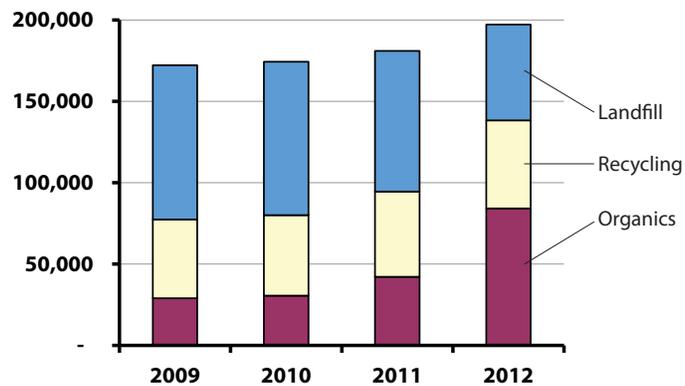


* Nov 2010 - Oct 2011 and Nov 2011 - Oct 2012, Shift from weekly landfill waste collection to every-other-week (EOW), and from EOW yard debris to weekly collection including food scraps.

Source: Bureau of Planning and Sustainability

Figure 4 shows the overall curbside waste collection for Portland residential customers. The amount of recycling has remained at approximately the same level since 2009. In 2012, residential waste collected at curbside consisted of 43 percent organic waste, 27 percent recyclable materials and 30 percent landfill waste. However, total waste collected at curbside in the residential sector has been increasing since 2009. In 2012, total waste was 8 percent higher than in 2011 and 13 percent higher than the total collected in 2009.

Figure 4 Residential waste collection (tons)



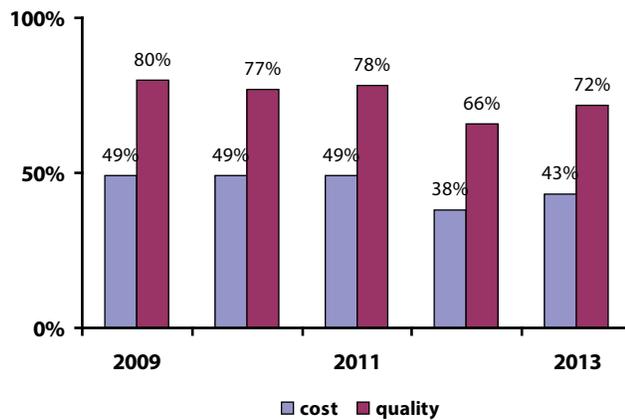
Food collection program implemented Oct 31, 2011

Source: Bureau of Planning and Sustainability

**Customer satisfaction
dropped, then
recovered**

The Auditor’s Office has conducted a survey of residents’ satisfaction with City services for the past 23 years. One set of questions asks residents to rate waste collection services on both cost and quality. Positive ratings for both cost and quality remained unchanged for the years leading up to the change in curbside collection service in 2011. However, in our survey conducted between July and August 2012, residents’ positive ratings declined by more than 10 percentage points for both cost and quality (see Figure 5.)

Figure 5 Positive responses on curbside waste collection



Food collection program implemented Oct 31, 2011

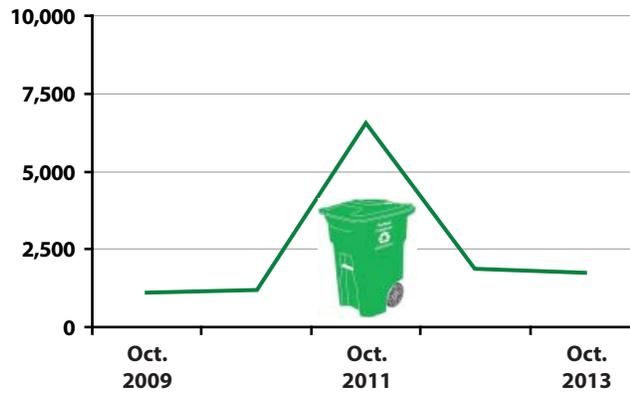
Positive responses include percent of residents who selected “Good” or “Very Good.”

Source: Audit Services, Community Survey 2013

In addition to reviewing residents’ satisfaction with waste collection services, we also reviewed data on customer calls and emails to BPS. Figure 6 shows the number of calls and emails received by the Bureau during the month of October in the years before and after the rollout of the food collection program. Around the time of the service change in October 2011, the volume of customer calls and emails increased 5 ½ times.

In the year after the new program and service change was instituted, the number of calls and emails to BPS declined and was closer to the 2010 level. In addition, our 2013 Community Survey found that customer satisfaction with both solid waste service quality and cost has mostly recovered from the low ratings in 2012. Introducing the curbside food waste collection service and changing garbage pick up to every other week contributed to the spike in customer calls and requests and the drop in satisfaction levels.

Figure 6 Number of calls and emails to Bureau of Planning and Sustainability



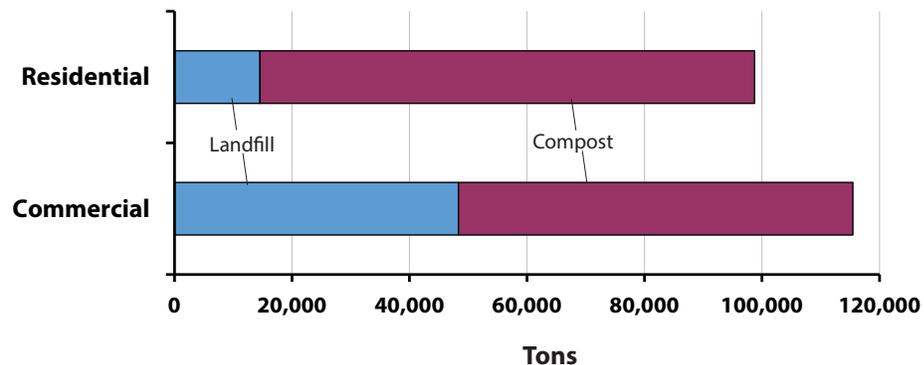
Food collection program implemented Oct 31, 2011

Source: Bureau of Planning and Sustainability

Commercial sector generates the majority of organic waste, but much ends up in landfills

Of all the organic waste generated in Portland, an estimated 46 percent is generated by the residential sector and 54 percent by the commercial sector. However, far more residential organic waste is collected. Most residential organic waste, 85 percent, is now collected and composted. In contrast, only 58 percent of commercial organics are collected and sent to be composted. Of the total organic waste generated in 2012, the amount collected from the residential sector was 84,197 tons, while the amount collected from the larger commercial sector was 67,154 tons.

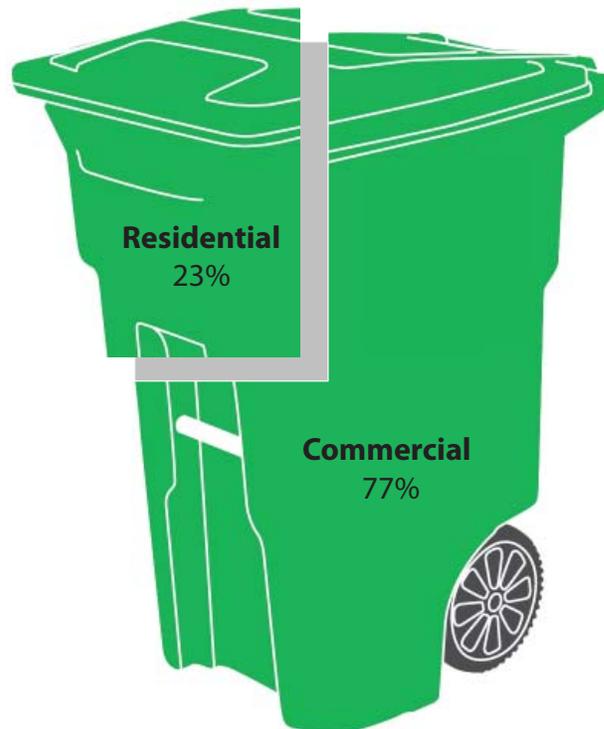
Figure 7 City's management of organic waste



Source: Bureau of Planning and Sustainability

In addition, the majority of residential organic waste consists of yard debris, not food waste. However, commercial organic waste is mostly food waste. As a result, the residential food collection program introduced in 2011 is not sufficient to divert the city's total food waste from the landfill. Of the total organic waste sent to the landfill and not composted, 23 percent is residential and the majority, 77 percent, comes from the commercial sector.

Figure 8 Organic waste sent to the landfill and not composted (2012)



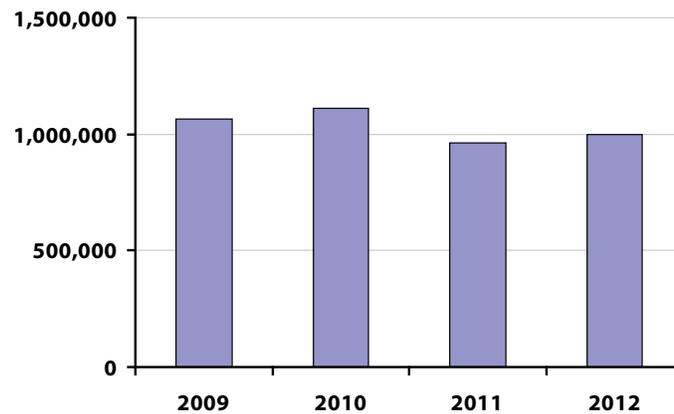
Source: Data from Bureau of Planning and Sustainability

According to BPS management, their strategy was to first focus on a voluntary commercial food collection program, then implement the residential curbside program, before working on increasing organic waste recovery for the commercial sector. In order to increase the commercial sector's organic waste rate and reduce the City's overall waste destined for landfills, it is necessary for the City to increase organic waste collection in the commercial sector.

Small decrease in waste generation

A November 2008 Metro audit found that residents and businesses were producing more waste than ever before, even though the recycling recovery rate has improved. In addition, the 2009 Climate Action Plan states that given the waste generation growth trends, by 2030 the Portland area will generate over one and a half times the amount of waste it generated in 2009. According to the Climate Action Plan, the disposal of waste increases the amount of greenhouse gas emissions. Although the City's goals include the reduction of per capita waste generation, the long-term goal is to reduce total waste generated by 25 percent below 2009 by 2030. Total waste generated in 2012 decreased 6 percent since 2009.

Figure 9 Total citywide waste generation (tons)



Source: Bureau of Planning and Sustainability

Note: In 2011 the Bureau of Planning and Sustainability changed how it calculates waste not collected by permitted haulers.

It is important to increase recycling and organic waste recovery rates in order to reduce the amount of waste destined for landfills. However, the recovery rate strategies addressing recycling and organic waste may not be sufficient to achieve the City's goal to reduce overall solid waste generated. In order to meet the City's 2030 climate objectives, residents and businesses must decrease the amount of total waste they generate.

Recommendations

Although the Bureau of Planning and Sustainability has made significant progress in increasing organic waste recovery rates in the residential sector, the Bureau needs to work on increasing these rates in the commercial sector.

We recommend that the Commissioner in Charge direct the Bureau of Planning and Sustainability to:

- 1. Increase the food waste participation rate for the commercial sector, including multifamily housing units. Identify clear incentives for businesses to divert food waste from the landfill.**
- 2. Continue working on identifying and implementing waste prevention strategies to reduce total waste generated for both the residential and commercial sectors.**

Objectives, scope and methodology

The objectives of this audit were to determine the status of the Solid Waste Program in achieving stated goals, and to identify program challenges. This audit was included in the City Auditor's FY 2012-13 Audit Plan. The scope of the audit includes the Bureau of Planning and Sustainability's Solid Waste Program, which includes garbage, recycling and organics waste collection for residential and commercial customers. We focused on the time span from October 2009 to October 2013, covering an equal period of time around the October 2011 date when curbside food-waste collection and every other week garbage pick-up were introduced.

To accomplish the audit objectives, we reviewed the Solid Waste Program's history and city ordinance, and reviewed the Bureau's budget documents and relevant city policies. To gain an understanding of the program's goals and plans, we reviewed the Portland Recycles! Plan and its solid waste goals. We also researched best practices and incentives relating to recycling and organic waste collection. We gained an understanding of the Compost Pilot Program and we interviewed Solid Waste Program managers and staff. We reviewed the franchise agreement between BPS and the curbside collectors and

associated enforcement policies and documents. To understand the region's waste management system, we interviewed a representative from the Oregon Refuse and Recycling Association and Metro auditors and staff.

The data we collected includes data on the city's and region's solid waste, including data on landfill waste, recycling and organic waste, as well as phone/email customer data. We also obtained the City Auditor's Community Survey data and compared to changes in BPS' solid waste program. To gain an understanding of solid waste practices and trends, we reviewed media articles related to solid waste and composting, audits from other jurisdictions, and other cities' solid waste programs and practices. For this audit, we did not review the region's capacity to handle organic waste and how it is disposed, since this was included in a recent audit by Metro - *Organic Waste Program: Re-examine cost-effectiveness and adjust efforts if needed*, October 2013.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

APPENDIX A

Climate Action Plan 2030 – Consumption and solid waste objectives and actions

Reduce total solid waste generated by 25 percent (2009 - 2030)	Recover 90 percent of all waste generated. Recover 75 percent by 2015	Reduce the greenhouse gas impacts of the waste collection system by 40 percent.
1. Work with partner organizations to encourage businesses and residents to purchase durable, repairable and reusable goods; to reduce the amount of materials that go to waste, including food; and to reduce consumption of carbon-intensive consumer goods and services.	1. Complete the implementation of mandatory commercial food waste collection in Portland and begin collection of residential food waste.	1. Provide weekly curbside collection of food waste, other compostable materials and recycling. Shift standard residential garbage collection to every other week.
2. Develop a measurement and evaluation mechanism to track waste prevented through preservation, re-use and thoughtful consumption.	2. Assist 1,000 businesses per year to improve compliance with Portland's requirement of paper, metal and glass recycling.	2. Complete the installation of particulate filters on pre-2007 waste collection vehicles to reduce particulate emissions. Older trucks that are not good candidates for retrofit should be phased out of operation.
	3. Together with Metro and Department of Environmental Quality, create and periodically update a regional waste management hierarchy that reflects energy and greenhouse gas emissions as key factors in prioritizing such technologies as commercial composting, digestors, plasmafication and waste-to-energy systems.	3. Evaluate actions under the Portland Recycles! Plan and consider additional regulatory options to improve the efficiency of commercial collection service.
	4. Regulate solid waste collection for unincorporated Multnomah County.	
	5. Provide technical assistance to contractors and construction firms to meet Portland's new requirement to recycle 75 percent of construction and demolition debris, giving priority to salvage and reuse activities.	
	6. Institute post-collection sorting for municipal solid waste, particularly for waste coming from sectors like multifamily housing that are typically underperforming on recycling.	
	7. Participate actively in the process to develop state and federal product stewardship legislation.	
	8. Explore mandatory residential recycling.	
	9. Clearly label trash cans and other garbage receptacles as "landfill."	
	10. Establish public place recycling in Central Portland.	

APPENDIX B

2007 Portland Recycles! Plan

- Promote sustainability of the solid waste and recycling system that includes maximum efficiency, equity and economic vitality, improved worker safety and reduced environmental and human health impacts over the entire life cycle of the materials.
- Minimize the impact of harmful wastes by targeting toxicity and reducing greenhouse gas emissions.
- Reduce per capita waste generation below 2005 levels by the year 2015.
- Increase recovery of all waste with a target of 75 percent by the year 2015 and promote highest value use of the recovered materials.

2015 Residential Program Recommendations:

- Add recycling and yard debris roll carts.
- Add new materials for recycling.
- Expand neighborhood collection events.
- Require hauler feedback to customers.
- Develop new emissions requirement for garbage and recycling trucks.
- Work with Metro and DEQ to develop standards for Material Recovery Facilities (MRFs).
- Include food scraps with yard debris and make yard debris collection weekly.
- Add garbage roll cart and begin every-other-week garbage collection.
- Develop customer and hauler incentives:
 - Differentiated can rates.
 - Waste reduction targets.
- Implement ban on recyclables in the garbage.

2015 Commercial Program Recommendations:

- Phase in new performance standards followed by additional regulation as needed to meet City goals for the waste collection system.
- Establish a new overall 75 percent mandatory recycling requirement for businesses by 2015.
- Establish new mandatory food scrap diversion:
 - Start with businesses that generate the most food scraps.
 - Expand to include all food scrap generators above specified level or size.
- Establish a new mandatory paper and containers recycling requirement for all businesses in the city.
- Increase mandatory CR&D recycling ordinance to 75 percent recycling and improve notification, education and verification of compliance.
- Give small commercial customers the option for service and rates under residential franchise.

(continued next page)

2015 Commercial Program Recommendations (continued):

- Provide additional education and technical assistance for CR&D, food and paper waste prevention and recycling.
- Promote salvage, reuse and recycled content products in construction, remodeling and demolition projects.
- Develop new hauler requirements and strengthen regulatory approval process.
 - Equipment and services to allow their customers to reach 75 percent recycling goal.
 - Require that all trucks use B20 and meet new emission standards.
- Build partnerships with business organizations to assist with and promote compliance with new recycling requirements.

RESPONSES TO THE AUDIT



OFFICE OF MAYOR CHARLIE HALES
CITY OF PORTLAND

March 31, 2014

Ms. LaVonne Griffin-Valade
Office of City Auditor
Audit Services Division
1221 SW 4th Avenue, Room 310
Portland, OR 97204

Re: Organic Waste: Residential collection increased, but challenges remain in larger commercial sector

Dear Ms. Griffin-Valade:

Thank you for the opportunity to respond to your audit of Portland's organic waste programs. I have reviewed your recommendations with Susan Anderson, Director of the Bureau of Planning and Sustainability, and we agree with your conclusions: Portland residents and businesses are making good progress toward our solid waste goals, but more work lies ahead for us all.

I agree with your recommendation that we need to re-double our efforts to support businesses in recovering more of our commercial organic waste. I will work with the Bureau of Planning and Sustainability to evaluate additional options to assist businesses and multifamily properties in recovering food scraps, and I look forward to implementing new activities in partnership with our businesses and property managers.

Thank you for your diligent analysis and prudent recommendations. They are a great service to our city.

Sincerely,

Charlie Hales
Mayor, City of Portland



Bureau of Planning and Sustainability
Innovation. Collaboration. Practical Solutions.

March 31, 2014

Ms. LaVonne Griffin-Valade
Office of City Auditor
Audit Services Division
1221 SW 4th Avenue, Room 310
Portland, OR 97204

Dear Ms. Griffin-Valade:

Thank you for the opportunity to respond to the “Organic Waste: Residential collection increased, but challenges remain in larger commercial sector” audit. My staff and I were pleased to work with the Audit Services staff, who conducted themselves and the audit with great professionalism, and we appreciated the opportunity to provide information and context during the audit process. I agree with the findings and conclusions of the audit and believe BPS resources and programs are aligned with the audit recommendations.

I appreciate the recognition in the audit of the success Portland has achieved through our current recycling and composting programs. Portland has required curbside recycling since 1987 and many Portland businesses have been composting food scraps since 2005. The implementation of residential food scrap composting and every-other-week garbage in 2011 led to a 38 percent decrease in garbage sent to landfill and close to a three-fold increase in yard debris and food scraps collected for composting. The program change also helped Portland achieve a 70 percent recovery rate in 2012, which is twice the national recovery rate of 34.5 percent, according to a recent report from the United States Environmental Protection Agency. Data from the same EPA report indicates that on a nationwide basis, just 30 percent of yard debris and food scraps are composted. In contrast, the audit points out that in Portland, 85 percent of residential yard debris and food scraps and 58 percent of yard debris and food scraps from businesses are collected for composting.

While Portland has made considerable progress toward our goals, I agree that we still have work to do. We anticipate that we will soon have sufficient, sustainable local processing capacity to fully direct our resources toward increasing food scrap collection from businesses and multifamily properties. We are preparing to expand our technical assistance to businesses to help them comply with the current requirement that large sources of food scraps collect those organic materials.

We also share your recognition of the importance of waste reduction. Though Portland has reduced total waste generated by six percent since 2009, we know we must continue that trend to reach the City’s goal of a 25 percent reduction by 2030. We will continue to collaborate with regional and state partners to establish policies and programs to reduce waste, such as product



stewardship efforts. We will also elevate waste reduction in the technical assistance we provide to businesses and in our outreach to residents.

Please extend my appreciation to your staff for their diligence and skill in carrying out this project and for considering our feedback throughout the process.

Sincerely,

A handwritten signature in black ink that reads "Susan Anderson". The signature is written in a cursive, flowing style.

Susan Anderson
Director

**Audit Services Division
Office of the City Auditor
1221 SW 4th Avenue, Room 310
Portland, Oregon 97204
503-823-4005
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Organic Waste: Residential collection increased, but challenges remain in the larger commercial sector

Report #447, April 2014

Audit Team: Alexandra Fercak, Bob MacKay

This report is intended to promote the best possible management of public resources. This and other audit reports produced by the Audit Services Division are available for viewing on the web at: www.portlandoregon.gov/auditor/auditservices. Printed copies can be obtained by contacting the Audit Services Division.

LaVonne Griffin-Valade, City Auditor
Drummond Kahn, Director of Audit Services

Other recent audit reports:

Building Permits: Extension practices inconsistent; documentation lacking (#420B, April 2014)

Housing Loan Program: Funding supports goals, but low repayment may jeopardize long-term success (#449, March 2014)

Sexual Assault Response: Progress made toward a victim-centered approach (#445, February 2014)

*City of Portland 23rd Annual
Community Survey Results
(#450, October 2013)*

