

# Christmas Tree and Yard Waste Collection Service Review



File #: 240671

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## **Background**

The City of Milwaukee Department of Public Works (DPW) modified its management of discarded cut Christmas trees during the 2023/2024 holiday season to remain in compliance with state requirements. Historically, Milwaukee residents have been encouraged to take trees to the Drop Off Centers to be managed along with yard waste but have also had the option to dispose of curbside as bulky items collected by garbage crews. This was consistent with the common understanding of Christmas trees as household decorations rather than yard waste, meaning they were not considered subject to the State's landfill ban in effect since 1993. Prompted by discussions with local units of government and private haulers, the Wisconsin Department of Natural Resources (DNR) clarified that Christmas trees should be treated as yard waste and are thus subject to the State's yard waste landfill ban. In response to the clarification, DPW notified the DNR that it would comply with the interpretation that Christmas trees must be managed separately from garbage, consistent with the yard waste ban. DPW notified the DNR of its intent to cease co-collecting live cut Christmas trees curbside by garbage crews and to continue to promote utilization of the Drop Off Centers. Discarded artificial trees or cut trees that are not bare (those not free of decorations or tree stands) would not qualify as yard waste and would still be eligible for collection by garbage crews. Through its research of local programs (see section **Community Program Research**), DPW set out to pilot short-term drop-off locations in City of Milwaukee-owned parking lots that would supplement the Drop Off Centers. A press release was sent on 12/05/2023 through DPW's e-notify listserv informing residents of the change. Common Council provided DPW feedback on its Christmas tree plan during the 12/11/2023 PWC hearing. Subsequently, file 231328 was adopted directing DPW to provide household collection of Christmas trees from December 26, 2023, to April 1, 2024. The file also called for DPW to report back to Common Council regarding the program and the concept of a year round yard waste program.

## **Christmas Tree Collection and Composting**

### **Operations**

The change from landfilling to composting trees collected curbside required DPW to stand up a segregated winter yard waste program to collect Christmas trees from December 26, 2023 to April 1, 2024. To be collected as yard waste, cut trees must be free of the stand and all decorations and must not be bagged. Trees must be placed at the collection point. Wreaths can only be composted if free of wire, plastic backings, and decorations. Residents were not required to submit a request via Click-for-Action like they would for seasonal brush collection. Instead, Sanitation set up a system to track Christmas trees placed at the collection point. Equipment Operators and Inspectors logged addresses while out on routes and gave the information to a supervisor. Sanitation Supervisors entered addresses into the work order system, and on days when staffing allowed, the work orders were assigned to segregated collection crews. Once collected by crews with a packer or pickup truck, the bare trees were taken to the transfer stations and tipped into bays designated for yard waste. Yard waste is transferred to the Waste Management compost site in Menomonee Falls. Staff continued this process through April 1,

2024. In April, Sanitation’s brush collection service begins for the season, so any trees put out after April 1 were collected and managed through the brush program and required residents to submit a request through Click-for-Action.

## Communications

DPW created the [Milwaukee.gov/holidaytrees](https://www.milwaukee.gov/holidaytrees) webpage to serve as the central location for program updates. Initial and reminder press releases were sent through the DPW and Recycle for Good e-notify listservs, which include members of the press. Program details were also shared on DPW social media accounts and further shared by other City departments and community groups.



## Snow and Ice Control Impacts

As the central pillar of snow and ice control operations, DPW's highest priority is keeping residents safe during the winter. As crews move to snow operations, waste and recycling services can be impacted during snow events. Implementing a curbside collection program for Christmas trees presented a risk of further delays as crews would need to prioritize snow and then work to catch up on standard routes before resuming tree collection. A storm hitting during high tree set-out rates, like mid-January, can lead to a collection schedule that is challenging for crews to manage quickly and efficiently. On January 12, a heavy snowfall hit Milwaukee. Crews worked to collect trees before the storm hit the area. In less than 48 hours, crews had to clear up to eight inches of snow before temperatures dropped below freezing. The heavy snow, followed by extreme cold, buried trees, which crews could not see or retrieve until the snow melted. Christmas tree collection resumed once crews finished snow cleanup and caught up on regular waste and recycling services. The pilot collection program demonstrated the potential strain on staff and operations in standing up a temporary segregated collection program. The staffing model that is in place for snow and ice control operations does not facilitate providing residents with date specific collection of Christmas trees. DPW received very few complaints about the delays experienced in collection of Christmas trees while staffing was committed to higher priorities.

## By the Numbers

Residents last winter were not required to submit a request through Click-for-Action for tree collection whereas that is the practice with brush. When a public request is submitted, it is automatically logged in DPW’s work order system and directed to the department responsible for the service. The absence of public requests impacted DPW’s ability to track the number of trees and route stops for efficient collections. An internal tracking system using the work order center was implemented; however, it created data and operations limitations as the addresses were manually logged and entered into the system. The final tree count was formed based on scale data from the transfer stations. An estimated 6,335 Christmas trees, or 107 tons, were collected curbside and composted during the 2023/2024 pilot program. Limited data is available on the average of US homes that celebrate the holidays with cut Christmas trees or the number of cut Christmas trees sold. Various resources estimate that 3% to 20% of US households have cut

Christmas trees. DPW estimated the potential for 5,610 to 37,400 Christmas trees to be placed curbside using that range.

### Future Program Opportunities

The curbside collection of Christmas trees can be resource-intensive, especially for communities without year round curbside yard waste programs. For this reason, many municipalities offer service during a limited period, typically two to three weeks. For the 2024/2025 season, DPW will require residents to submit a request using the same system for brush requests. Using Click-for-Action will ensure DPW can build an efficient collection schedule and provide more detailed data on the number of trees, labor, and equipment hours. The program will run from December 26, 2024, to January 31, 2025. This timeframe captures the highest set-out rate and is comparable to the timeframes offered by those communities researched that offer curbside collection.

### Community Program Research

To right-size its program, DPW researched 22 local programs. Below is a breakdown of the findings. The City of Chicago’s program was used as a model for developing DPW’s original supplemental drop-off program. Over the two-week program in 2022, Chicago residents dropped off over 20,000 trees or 730,000 pounds at 27 temporary drop-off locations in parks across the city. Chicago’s Department of Streets and Sanitation does not provide curbside Christmas tree collection.

Collection Programs by Service Type	
Service Type	Number of Communities Offering Service
Curbside Only	7
Drop Off Only	5
Curbside and Drop Off	7
Not Announced or Searchable	4
<b>Total</b>	<b>23</b>

Curbside Collection Program Schedules	
Program Time Period	Number of Communities
2 Weeks	6
2+ Weeks	6
Not Announced or Searchable	2
<b>Total</b>	<b>14</b>

Programs by Disposal Type	
Disposal Type	Number of Communities
Compost	9
Unknown	11
Landfill	3
<b>Total</b>	<b>23</b>

# **Year Round Yard Waste Collection**

## **Background**

DPW released a request for proposal in April 2016 to conduct a pilot organics collection study. Proposals were accepted for 1) organics including yard waste or 2) organics not including yard waste. The pilot program was conducted from November 2016 to September 2020 and served a maximum of 577 participants. The paid subscription pilot was limited to 1 to 4-unit household buildings or condos receiving City garbage and recycling collection in the Bay View, East Side, and surrounding neighborhoods; however, the online interest form remained open to those outside the pilot zone. Composted food and yard waste were collected from City-owned properties in City-provided 65-gallon carts. Over 1.4 million pounds of food and yard waste were diverted from landfill during the pilot program. DPW released another RFP in February 2020 to expand organics collection City-wide and provide equitable access to all 1 to 4-unit households. No contract was awarded primarily due to the limited organics processing capacity of mixed food and yard waste. The pilot's final report (File #210035) concluded that implementing a seasonal city-wide yard waste program was more favorable over food waste due to the adequate processing capacity in the region, stable markets, and a broad customer support base. Furthermore, if the City operated a seasonal yard waste collection service, the available staff and equipment could be utilized in DPW's snow and ice control operations. DPW modeled two approaches to implementing a yard waste only seasonal collection program including the capital and operating costs. To date, budget constraints have prevented the implementation and operation of a seasonal yard waste collection program.

Resolution 321328 instructed DPW to treat the collecting and composting of Christmas trees as a pilot and to report to Council on a plan for year round yard waste collection. DPW reviewed its prior reports and the cost modeling it had done and concluded that the yard waste findings continue to reflect current market considerations and DPW's operational capacity accurately. Assumptions and costs were reviewed and updated as described below.

## **Program Options**

Two options for a seasonal yard waste collection service are outlined below. If the City of Milwaukee created a seasonal yard waste collection service and retained staffing during the winter months to support DPW services such as recycling collection and snow and ice control, the estimated costs to establish this full, City-wide service are provided below. An annual 3% adjustment to operating and capital costs was applied to update the estimates that originally had been derived from 2020 figures.

### **Option 1: Resident-Provided Bins or Paper Bags**

Option 1 consists of a seasonal yard waste program where residents set out yard waste in paper bags or their own bins for collection. 25 new service routes, including 60 Equipment Operators (two per packer due to the collection's manual nature), four Yard Attendants, and five Sanitation Supervisors. The annual operating costs include administrative, fleet, and yard waste processing

costs and the wages for the positions listed above. The capital expenditures include Sanitation Supervisor and Yard Attendant vehicles and 25 new refuse packers.

<b>Annual Operating Cost</b>	\$9,207,249.13
<b>Capital Expenditures</b>	\$9,811,712.60
<b>Total</b>	<b>\$19,018,961.73</b>

### **Option 2: City-Provided 64 Gallon Carts**

Option 2 assumes residents receive a City-provided 64-gallon cart. Collection service would be provided during the spring, summer, and fall months. The yard waste collection program would require 25 new service routes, including 30 Equipment Operators, eight Yard Attendants, and five Sanitation Supervisors. The annual operating costs include administrative, fleet, and yard waste processing costs and the wages for the positions listed above. The capital expenditures include Sanitation Supervisor and Yard Attendant vehicles and 25 new refuse packers.

<b>Annual Operating Cost</b>	\$6,122,852.47
<b>Capital Expenditures</b>	\$20,422,675.20
<b>Total</b>	<b>\$26,545,527.67</b>

### **Conclusion**

A year round organics or seasonal yard waste collection program would provide greater service and more access to all City residents while providing more convenient landfill diversion opportunities. A curbside yard waste program would have the potential to expand in the future to include food waste as regional processing capacity develops and residents become accustomed to source separating material, furthering landfill diversion rates. The additional staff and equipment required by a seasonal yard waste collection program could in winter months be available to support other services, such as the City's critical snow and ice control operations. To date, budget constraints have prevented implementation and operation of a seasonal yard waste collection program.