



4301 Connecticut Avenue, N.W., Suite 300 ♦ Washington, D.C. ♦ 20008 ♦ 202-244-4700 ♦ Fax: 202-364-3792

June 10, 2004

Ken Laden
Associate Director for Transportation Policy and Planning
DC Department of Transportation
2000 14th St, NW, 7th Floor
Washington, DC 20009

RE: Motor Carrier Management and Threat Assessment Report

Dear Mr. Laden

The National Solid Wastes Management Association (NSWMA) is a trade association representing private sector companies that collect and dispose of solid waste and collect and process recyclables. NSWMA members collect commercial waste and recyclables in the District of Columbia. Collecting garbage in a timely manner – especially putrescible waste – is an important public and environmental health necessity. Our industry prides itself on its ability to provide an efficient, cost-effective, environmentally protective service.

The following comments are submitted in response to the April, 2004, “Motor Carrier Management and Threat Assessment Study”, prepared for the District Department of Transportation by the U.S. Department of Transportation’s Volpe National Transportation Systems Center. At this point, we are limiting our comments to those proposals directly affecting the collection of municipal solid waste.

First, the recommendation to allow large trucks to operate in the Tier III area only between 6 p.m. and 7 a.m. will cause major operational problems. Our industry needs the flexibility to be able to collect trash regardless of the time of day. Limiting collection hours as proposed by the Volpe study could lead to a number of problems including a shortage of drivers willing to work only at night, a competitive disadvantage for smaller companies that would be less able to hire drivers and maintain their equipment during those hours and an inability to deliver trash to transfer stations that normally close in the early evening and do not reopen until the morning. In addition, emergency provisions will be necessary to allow garbage trucks to help clean up after storm events, such as high winds, that may occur in the restricted time period.

The hauling and recycling industry understands the necessity of easing congestion in a crowded city. Thus, our members find that early morning hours are particularly advantageous for collecting garbage and recyclables. Deserted streets are easier and quicker to navigate and are less likely to be the scene of accidents involving potential injuries and property damage. Moreover, our trucks will have lower emissions when traffic is less congested. In addition, many of our commercial customers, especially bars and restaurants, contract to have their refuse removed as soon as possible after closing hours so that potential public health impacts are minimized. As a result, we do not support measures, such as the recent proposal before the District of Columbia Council, to limit commercial collection to daylight hours. At the same time, restricting collection to evening and early morning hours creates its own set of problems as noted above.

Second, we are not security experts, however the proposed definition of the Tier III area includes virtually all of the commercial sector of downtown Washington. This very large area includes more than just sensitive Federal installations. A more scaled-down area might be more appropriate, especially given the proposal that trucks receive permits to access Tier III and the time and effort that would be required to issue those permits.

Third, we regret that the NSWMA was not formally contacted during the study. We understand that some hauling companies were interviewed, but hope that in the future we will be able to work directly in resolving these important problems.

Please feel free to contact me if you have any questions about our comments. In addition, you can contact Chaz Miller, of my staff at cmiller@envasns.org.

Sincerely

Bruce Parker
President & CEO

cc: Jeff Bryant, Volpe Center