Why New Haven Should Not Enact A GPS Program for Recycling and Waste Collectors

Night-time and early morning collections minimize collection vehicles interfering with traffic and business activities and ensures recyclables and wastes are collected as safely as possible while protecting the environment and public health.

The proposed GPS requirement for city haulers should be rejected. Numerous serious safety and health issues will arise immediately if current collection trade practices are restricted to the extent likely under this proposal. Some examples follow:

- 1. The number of heavy vehicles in downtown and congested areas will increase when children are going to or from school, and when people going to or from work or to engage in commercial activity;
- 2. Collection vehicles will interfere with daytime traffic and other usual business activities and increase the traffic congestion aggravation of motorists and pedestrians;
- 3. Commercially generated recyclables and wastes from restaurants, supermarkets, delicatessens, will stay longer in alleys and sidewalks. Vectors such as rats and other vermin will increase;
- 4. Fire hazard potential will be increased since recyclables and wastes will accumulate in cellars, hallways and service areas since collectors will now suffer daytime delays in collecting these materials;
- 5. More fuel will be consumed providing the essential service of collecting recyclables and wastes; and by so doing the ambient air quality will be impacted and will not be on the best possible path forward to meet strict EPA and CT DEEP air quality standards;
- 6. The collection of recyclables and wastes in New Haven will be less efficient and economical since busy daytime streets obstructing collection operations will not be avoided. This means citizens and businesses will have to pay new costs: of unproductive labor expenses; of unnecessary wear and tear on collection vehicles; and, of the additional fuel consumed associated with inefficient daytime collection operations.

Any significant change to our hours of collection trade practices will have other rippling effects too. For example, current industry practices are fine-tuned since recycling and waste facilities are only open during, limited daytime hours. This means trucks arrive early at facilities to tip their loads of recyclables or wastes and try to fill up and tip again as many times as possible during the balance of the day. Commercial collectors arrange their staff and routes to see their trucks are full and at the management facility's gate to tip first thing in the morning and throughout the day. If nighttime and early morning access to waste and recyclable collections is lost, recyclables and trash will either have to endure longer wait times between collections (which cause problems as noted above) or collectors will have to buy more trucks and containers, hire more staff, and saturate getting their trucks with waste or recyclables to tip their loads at facilities during limited facility operating hours.

Last, any significant change to our trade practices, like those likely under the GPS proposal before you, will serve to make the impacts of our collection activities operations more noticeable.

Today's present recycling and waste collection trade practices have served the city well. We believe that passage of this proposed GPS ordinance is not the best path forward to address the concerns expressed in this hearing and others. We urge you not to pass it out of committee today.