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On the Draft Generic Environmental Impact Statement for the
Commercial Waste Zones Plan
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The Draft Generic Environmental Impact Statement (DGEIS) for the Commercial Waste Zones Project confirms basic findings of several previous studies of the NYC private carting system which showed the great potential environmental benefits of a zoned waste collection system, and affirms what workers in the industry have known for decades: The current commercial waste system is grossly inefficient and unsafe, and our City can greatly improve working conditions and safety while reducing pollution, the amount of waste sent to landfill, *and* operating costs by adopting a far more efficient and accountable commercial waste zone (CWZ) system.

Efficiency and Cost Savings

Based on recent route sheets and customer data submitted by the carting industry, the DGEIS definitively shows that on a citywide basis, thousands of large, diesel waste trucks drive much farther than necessary to move commercial waste from generators to recycling and transfer facilities, and that workers are pressured to work much longer overnight shifts than would be necessary in an efficient system. Notably, the results of the environmental review demonstrate that haulers can reduce and contain operating costs under a zone system, creating system-wide savings that can be invested in better labor standards, fair prices for customers, cleaner truck engines, better recycling practices, and better customer education.

In addition to the non-exclusive CWZ plan proposed in the City's implementation plan, the DGEIS includes analysis of an exclusive waste zone scenario, in which a single, accountable waste provider is selected to serve customers in each of 20 zones via a competitive RFP process. Both vehicle miles traveled reductions and operating cost savings would be significantly more pronounced under an exclusive system than a system with multiple haulers allowed in each zone. The DGEIS finds that an exclusive zone could reduce VMT in Midtown Manhattan by 79%, with 66% and 63% reductions in the Queens and Brooklyn neighborhoods studied. This translates into a substantial \$23 million in operational cost savings compared to a "No Action" scenario--not to mention a reduction in emissions and greenhouse gases as trucks are traveling shorter and more efficient routes.

Waste Diversion

The DGEIS also examines the impact a CWZ system will have on commercial waste diversion -- which will need to be rapidly improved if we are to have any hope of making the City's Zero Waste and greenhouse gas reduction goals a reality.

This study finds that, due to the far more efficient private carter operations in a CWZ system, commercial recycling can be improved from a baseline of 25% to 44% without a substantial increase in carter and customer costs, and that the industry will experience a net increase in local jobs due to expanded recycling sorting and processing operations, which are far more job-intensive than landfilling and incineration.

The DGEIS confirms that a CWZ system is the only way to substantially increase commercial diversion without large increases in truck traffic and operating costs associated with even minimal diversion improvements in the "No Action" scenario.

However, the diversion scenarios in the DGEIS are quite modest, and a robust CWZ system combined with strong commercial waste reduction policies could perform far better than the 6% commercial organics recycling rate and a 44% overall commercial recycling rate assumed in this study. In fact, with a 44% commercial recycling rate, New York City would continue to lag far behind cities like Seattle, San Jose, and San Francisco, which have achieved better than 60% commercial diversion rates (65% in Seattle in 2017) driven by aggressive commercial organics recovery programs under versions of exclusive zone systems.¹

For example, even if NYC achieves the six-fold increase in commercial organics recycling envisioned in the DGEIS, our commercial sector would still be composting 20,000 fewer tons than Seattle's commercial businesses, in a city with ten times Seattle's population.

The DGEIS also assumes that only one in four customers would complete a third-party waste assessment to identify ways to reduce disposed waste through reduction, re-use, and recycling. By adopting policies to encourage or mandate objective, third-party waste assessments, the CWZ program could go even farther in helping businesses to reduce, donate, and recycle portions of their waste streams and reduce monthly garbage bills.

¹ Seattle reported a 65% commercial recycling rate for 2017, and a 7.3% increase in commercial organic waste tonnage and with a concurrent 1% decrease in garbage (landfill) tons collected in 2018.

Legislation

With the efficacy of the CWZ framework affirmed by this study, It is now up to the City Council and the administration to pass legislation that implements the strongest possible CWZ system, consistent with the social equity and environmental values our City has rightly adopted.

The CWZ legislation and resulting policy are where the promise of this reform will be translated into real, tangible benefits for New Yorkers, and must include:

- **Fairness for Workers:** The CWZ policy must ensure that workers are treated fairly by employers under a CWZ system. The operational savings for carters in a CWZ system must translate into living wages, retirement benefits, reasonable shifts, state of the art safety practices, and job security for the thousands of men and women who haul and process commercial waste. This is most feasible through an exclusive zone system, in which carters have fewer incentives to cut corners on safety, overload routes, and underpay workers.
- **Environmental Justice:** The CWZ policy must incentivize the use of state of the art facilities for processing waste, as well as facilities sited geographically proximate to the hauler's route and/or truck depot/garage. The City should use this opportunity to help communities overburdened with poorly sited truck-intensive transfer stations, and can facilitate the creation of hundreds of new, high-quality local jobs by incentivizing haulers to make investments in more equitably sited, safer recycling facilities through the CWZ RFP process.
- **Fairness for Small Business:** Under a CWZ system, prices for recycling and waste services should be transparent and rational, and every customer should have access to high quality service and effective enforcement mechanisms when needed. All small businesses should be able to access diversion services such as organics recycling and waste assessments, which are often unavailable them under the current system.
- **Waste Reduction:** The CWZ system should include disposal reduction targets for each zone consistent with the 90% reduction goal of One NYC. In addition to the recycling processing jobs included in the DGEIS, a high-diversion CWZ system can create hundreds of additional, good jobs in food rescue, electronics recycling, local organics processing, and facility construction, many of which can be targeted to disadvantaged local communities and MWBEs.
- **Cleaner Air:** In addition to the huge VMT reductions enabled by a CWZ system - especially an exclusive system - legislation can strongly incentivize haulers to replace diesel engines

with cleaner CNG and/or electric engines. In particular, an exclusive CWZ model would give haulers the long-term financial stability to raise capital and make these investments.

- **Safer Streets:** an efficient CWZ system -- especially an exclusive system -- will eliminate hundreds of unnecessary diesel truck miles from local neighborhoods every night, reducing pressure on workers to rush and speed, and with shorter shifts, decreasing the risk of fatigued driving. With the right legislation, this means less danger for pedestrians, cyclists, and drivers citywide, and safer, more humane working conditions for thousands of drivers and helpers in the industry.

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