

Burlington City Council  
City Hall  
149 Church Street  
Burlington, VT 05401

**RE: Consolidated Collection**

Dear Members of the City Council,

As you prepare to make your decision regarding consolidated collection in Burlington, we – the local refuse haulers – respectfully submit this letter to address some of our concerns with this motion. The City Council has put great stake in the study from Gershman, Brickner & Bratton, Inc. (GBB), a company based in Virginia. From that study alone, the Department of Public Works (DPW) put together their recommendation to the City Council, including their comparison matrix.

We feel that we have been left out of a discussion that deeply affects our businesses and the livelihoods of our employees. We are disappointed that the work of an out-of-state 3<sup>rd</sup> party organization was prioritized over the expertise of Vermont businesses and the waste management industry which have served the City of Burlington for generations. The GBB report overstates the environmental benefits and routing efficiencies to be obtained through consolidated collection and underestimates the costs required to operate this service. At no point in time, did the GBB engage with our businesses to understand the current dynamics or use real data in creating their analysis – therefore the entire study is based on generalizations rather than accurate data. As the local industry experts, we, Duffy's, Gauthier's, Myers, and Casella, would like to present the following concerns about this report and the resolution it informed.

Environmental Benefit: The environmental benefit of the Municipal and Hybrid Model is tucked away at the end of the report, and for good reasons. The conclusions drawn on pages 47 and 48 are based entirely on generalized assumptions and the experience of other municipalities not local to Vermont. As a result, the findings of the report are not built on qualified data accounting for the current collection system in Burlington. The report heralds a 2/3rds reduction in emissions – without understanding what the current emissions factors are, how can this determination accurately be made? **We believe that the GBB study overestimates the environmental benefits and greenhouse gas emission reductions that can be achieved by the municipal model.**

- Projected emissions reductions and routing efficiencies are based on an assumed reduction in total route miles, as the current system will be reduced to the City serving the residents rather than multiple haulers. Instead of reducing miles, this Model will increase miles and truck traffic, particularly in areas like downtown Burlington where private haulers will be passing residential households to pick-up commercial properties (4+ units) that are on the same streets. Rather than reduce the number of trucks on the road the Municipal Model will increase traffic.
- The study assumes residents subscribe to every-other-week recycling collection. 47% of the study's respondents indicated that they currently subscribe to weekly or twice-weekly pick up of their recyclables. Should this frequency be implemented, emissions from recycling pick up would be **double** what the study predicts.

- The report admits that “The GBB team did not have existing routes from the haulers to compare the results of the routing scenarios. (pg.48)” Had the City engaged haulers during the study period, the City could have obtained routing information so that accurate data could have been included to inform the study’s results.

The GBB report, as well as the information presented by the DPW, undermines, and overlooks the significant investments local businesses have made in infrastructure, equipment, and our people - investments we have made to build prosperous businesses that provide stability for our employees and essential services for our communities while protecting the health and safety of those communities and the environment.

- Local businesses have made significant investment in recycling infrastructure, demonstrating a commitment to sustainability.
  - Myers Container Services (Myers) provides a vital service to the community by operating the only local construction and demolition recycling facility. Employees sort through construction debris to ensure valuable materials are recovered for recycling and reuse and are diverted from the landfill.
  - Casella invested in a state-of-the-art food and beverage depackaging facility to support the Act 148 food waste ban and assist our customers in recovering more organic and recyclable materials from their waste stream. This operation is the first of its kind in Vermont and enables small and large businesses and institutions to recovery their food waste and return it for beneficial use and renewable energy within the Vermont economy.
  - These facilities are just two examples of how the private industry has mobilized its resources and expertise to meet the demands of our customers and partner with our State to advance materials recovery goals.
- Local haulers have invested in CNG fleet and infrastructure. The Williston transfer station is home to the first commercial CNG fueling station in Vermont. The City relies on this infrastructure when their own station is not operating. GBB’s emissions analysis assumes **all** waste and recycling trucks operating in Burlington are diesel, when there are low emission CNG trucks currently serving the Burlington community.

Upfront Operating Costs: The DPW predicts \$6.7 million in upfront costs to implement the Municipal Model including: a new building, additional vehicles, and carts. DPW also predicts the need for a \$5million/year enterprise fund to operate the Municipal Model. The DPW notes that this is a “conservative estimate.” **We believe that the predicted expenditure for the proposed Municipal Model is grossly underestimated.** From our collective experience, we believe that the actual cost to develop and maintain this Model will exceed the predictions due to several factors the City has negligently overlooked:

- The waste and recycling industry is experiencing record inflation rates for trucks, parts, fuel, and wages. In addition to inflation, we are experiencing 6-12 months lead time for trucks and parts. As a result of an imbalance in supply and demand, a challenge labor market, and an instable supply chain the cost of equipment is rising monthly. The predicted costs from this study are already outdated.

- Businesses and industries across the country are facing a hiring crisis in the wake of the COVID-19 pandemic, a crisis that compounds an already limited labor pool of truck drivers, operators, and mechanics. The industry, including our company's, has thousands of vacancies for drivers, laborers, mechanics, supervisors, and managers. The City will not be immune to the labor shortage.
  - This labor shortage touched our industry before the outbreak began and will linger even after we have beat the pandemic. This is due largely to an aging workforce, increased and competing demand for qualified drivers, and tightening of eligibility requirements for CDL drivers.
- The Municipal Model underestimates the number of staff required to run an operation of this size. The operating plan suggests it will need an additional 9-12 employees to the current recycling operation. To ensure there is no disruption in service, the City will require redundancy in its workforce and fleet to accommodate for vacancies, PTO, workers compensation and FMLA as well as truck breakdowns and failures as well as surge periods like college move out. Redundancy of any kind was not considered as part of the study.
- As members of the community and taxpaying citizens and businesses, we believe the City should utilize these funds to support critical infrastructure that is currently underfunded or requiring renovations like schools and affordable housing.

Interestingly, because of the many issues listed above, we are seeing businesses and municipalities across the United States exit the industry or privatize service to reduce risk. This trend was not highlighted as part of the GBB study and is the exact opposite of what is being proposed.

**Lack of Public Engagement: We believe the DPW has not taken the appropriate steps toward engaging its constituents** – including residents, businesses, organizations and the private waste and recycling industry – to learn of their concerns and suggestions.

- Private industry has not been engaged by the DPW or the City to explore ways in which it can support the City's near- and long-term goals.
- Essential workers, within every private waste and recycling company operating in Burlington, have not been given the opportunity to share their perspective on how this resolution could affect them.
- The GBB study does not capture an accurate representation of Burlington residents. The survey issued only reached 1.5% of households in Burlington. Adults over the age of 55 accounted for 71.3% of respondents while this same demographic makes up 33.5% of Burlington residents. 32.2% of respondents were renters, while 64.2% of Burlington residents are renters.
- The city held their first public engagement session on August 26<sup>th</sup> which was not well advertised or well attended, none of the three community members in attendance offered feedback.
- The DPW also released a survey to gauge citizens' opinions on consolidated collection. The definitions of terms such as "municipal model" and "Franchised model" were underwhelming and presuppose those citizens already have a working understanding of the issue at hand.

We urge the City to engage with members of the private waste and recycling industry. Public-private partnerships have long proven to be an effective means of reaching economic and environmental goals.

This approach is rooted in leveraging collective expertise and resources and creating innovative solutions to challenge the status quo.

We would be pleased to have the opportunity to sit down with the Council and DPW to learn about what each are trying to achieve and brainstorm opportunities to work towards a solution(s) together. Timing is of the utmost importance as the City continues to press forward with this issue and subsequently threatens our industry and fiscal responsibility of taxpayers.

Respectfully,

Burlington Area Waste and Recycling Haulers