



Northeast Region

Mr. Janno Lieber, Chair and CEO
Metropolitan Transportation Authority
2 Broadway
New York, NY 10004

Dear Chairman Lieber,

I am writing you on behalf of the National Waste & Recycling Association (NWRA). NWRA represents the private sector waste and recycling services industry. Our members conduct business in New York City and all 50 states and include companies that manage waste collection, recycling and medical waste, equipment manufacturers and distributors, and a variety of other service providers. NWRA represents the hardworking men and women of this chapter who collect and manage the waste produced by the 100,000 plus commercial entities in this great city.

The reason for this letter is the MTA's proposed Central Business District Tolling otherwise known as Congestion Pricing. Our members are greatly concerned about the detrimental impact this new system will have on the waste and recycling industry in New York City going forward.

The MTA states that the Central Business District Tolling Program was modeled on urban congestion pricing programs around the world and aims to reduce traffic congestion and raise needed revenue to improve public transportation. NWRA applauds these noble goals but are concerned that they will have unintended consequences for waste and recycling in New York City.

In 2019, New York City adopted local law 199 that restructured the commercial waste industry. With the same goal as the Central Business District Tolling of reducing traffic congestion for a cleaner environment, as well as improving safety. The law created a program that mandated dividing New York City into twenty commercial waste zones with a limited number of haulers in each zone (no more than 3). In short, the private waste and recycling sector will be much closer to the Department of Sanitation's methods of collection. This is the most consequential change to the commercial waste industry since the 1950's.

In late July, many waste and recycling companies submitted bids to collect waste in these twenty zones. This was an incredibly complex process with DSNY placing a strong emphasis on haulers providing high-quality services at a low-cost. Haulers have had to



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calculate skyrocketing inflation and labor costs into our calculations when putting together these bids. Now we find out MTA will be adding additional unaccounted for costs on our vital services.

As I stated earlier the fundamental goal of the Central Business District Tolling Program is to reduce traffic congestion by encouraging people to consider alternative, more environmentally friendly ways of entering New York City. This is not an option for our members. They will not be removing waste and recycling from the city streets on while riding the M2 bus line. So, what this added fee becomes is just an additional tax on the waste and recycling industry that will be passed along to customers for vehicles that leave and enter the City in the middle of the night, at low traffic times, with no alternative way to perform their essential functions.

While we know the MTA is inundated with requests for exemptions that will make it more difficult to achieve its revenue target, we are advocating for such an exemption to industries, like ours, that have no alternative way of performing essential services to the City. Alternatively, New York City could follow the London model and exempt the toll from 6pm until 7am in the morning as this may move a small amount of waste industry traffic to these low congestion times.

Thank you for the opportunity to provide the foregoing comments for consideration.

Sincerely,

Lewis A. Dubuque

Lewis A. Dubuque
Vice President, New York City Chapter
National Waste & Recycling Association

CC: DSNY Commissioner Tisch
BIC Commissioner Crotty