



WASHINGTON REFUSE & RECYCLING ASSOCIATION

April 14, 2023

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

Re: T-220252 Motor Carrier Safety Rulemaking

Dear Ms. Maxwell:

The Washington Refuse and Recycling Association (WRRA) represents the private sector solid waste and real recycling industry in Washington– from curbside collection services to our state-of-the-art recycling facilities, composting operations, and landfills. WRRA represents most regulated solid waste collection companies in Washington State. As such, it has taken part in virtually every Washington Utilities & Transportation Commission rulemaking, workshop, hearing, and other proceeding regarding solid waste since the inception of solid waste regulation in 1961. WRRA member companies and the solid waste industry serve a vital role in our state’s public health, safety, and environmental protection.

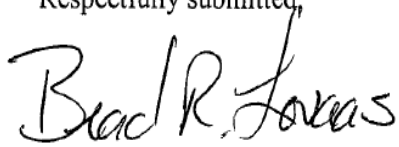
WRRA shares the goal of ensuring the Commission’s safety rules are sufficient. WRRA member’s most valuable assets are the excellent employees that ensure continuity of essential public health services every day. We would like to extend our thanks to Staff for the work on this proposed rule and for hosting a workshop to further dialogue on these important issues. Overall WRRA supports the work of Commission Staff in this rulemaking process.

With the current shortage of CDL drivers across the nation, many transportation service providers have had difficulty finding qualified drivers. WRRA appreciates any work by Commission staff that further enables regulated solid waste collection companies to hire qualified drivers, such as the proposed new section, WAC 480-70-203. Our understanding is that

the rule language is drawn from an existing rule for passenger transportation companies, WAC 480-70-203 and we understand Staff's goal to keep rule language consistent. It may be helpful to include the word "or" after section 1(b)(2) and 2(c)(i) as the following sections reference vehicle seating capacity not directly related to the majority of vehicles operated by the solid waste industry. WRRRA has also supported proposals before the legislature to address the ongoing CDL driver shortage as well, such as HB 1058 / SB 5251 relating to Commercial driver licensing procedures.

Thank you for the opportunity to comment on this rulemaking. Should Staff have any questions, please reach out to Rod Whittaker at rod@wrra.org or myself, Brad Lovaas at brad@wrra.org or 360-943-8859.

Respectfully submitted,

A handwritten signature in black ink that reads "Brad R. Lovaas". The signature is written in a cursive, flowing style.

Brad R. Lovaas

Executive Director