

**From:** [Chris Leman](#)

**To:** [Comprehensive Plan process](#) ; [Comp Plan process](#)

**Sent:** Tuesday, February 26, 2008 12:36 AM

**Subject:** Proposed Comprehensive Plan amendment to the Transportation Element: After policy T-69, add a policy discouraging extra-heavy transit buses and solid waste trucks that unacceptably damage Seattle's roads and bridges

CITY OF SEATTLE  
COMPREHENSIVE PLAN AMENDMENT APPLICATION

Date: February 25, 2008

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*Name of General Area/Location/Site which would be affected:* All of Seattle

*1. Provide a detailed description and explanation of the proposed text amendment.*

To the Transportation Element, after policy T-69 add the following new policy: Seek to reduce damage to Seattle's roads and bridges that is caused by heavy vehicles, including transit buses as well as trucks used by the City and its contractors. Accordingly, encourage transit agencies to purchase buses that are no heavier than would be allowable for a truck; and establish incentives to discourage the City's solid waste contractors to use trucks that are so heavy as to require the state's solid waste vehicle exemption that allows weights higher than for other trucks.

**Explanation:** According to engineering studies conducted by many organizations, including the Seattle Department of Transportation, an unusual proportion of damage to our roads and bridges is caused by heavy vehicles. The amount of damage increases exponentially with weight--that is, at heavy vehicle weights, a slight increase in weight can cause a substantial increase in damage. Because road and bridge damage increases exponentially with weight, an unusual amount of damage is done by those vehicles that exceed the normal weight limits established by state law. Vehicles exceed the normal weight limits either because they are breaking the law, or because the law itself allows certain types of vehicles to be heavier than would normally be allowed.

According to SDOT's own studies, some of the worst damage to Seattle's roads and bridges is caused by Metro buses. The evidence is all around us, as the streets that the buses use have cracked concrete pavement, and the asphalt pavement is curled up as if by a plow. The weight of these buses would cause them to be prohibited from our streets if the state legislature and then Congress had not completely exempted them from any weight regulations. The only protection that Seattle's streets and taxpayers now have is the good sense of King County Metro, and the advocacy of Seattle City officials. Unfortunately, in 2003 King County Metro began making huge purchases of buses that, even when empty, are the heaviest vehicles on the road, and with every trip do substantial damage to Seattle's roads and bridges. No one in the Seattle government--not SDOT, not the Mayor, not the City Council--did a thing to try to persuade Metro to choose buses that would not do so much damage.

The other heaviest vehicles on the road are garbage and recycling waste trucks, which under state law enjoy a special exemption allowing them to weigh considerably more than any other truck. Studies by the Washington State Department of Transportation find that these solid waste trucks do more road and bridge damage than any other kind of truck, and for this reason, WSDOT does not allow these trucks at that weight to use state highways. Seattle has no such caution. These trucks--which, please recall, are working for the City--are everywhere, especially on roads and alleys that are already in the worst shape. If the City lacks direct control over Metro's choice of buses, it has far more control over the weights of the garbage and recycling trucks that operate under a detailed contract with the City. The City would be

completely within its rights to require that its contractors not operate at a weight more than the normal state limits (that is, so that they would not require use of the state's exception for overweight solid waste trucks), or alternatively to suffer financial disincentives whenever they make use of this exception.

In 2001, after the author suggested this policy, Seattle Public Utilities' Solid Waste Contract Manager replied as follows:

Your suggestion on contract incentives to use smaller trucks is an excellent one. Our current contracts did not contain this incentive in the Request for Proposals and there is no contract language covering this issue. However, we can and will include this type of incentive in any new contract offerings. We could also ask for differing proposals and prices. One proposal and price would require that the contractors only use collection vehicles that do not exceed a certain weight. An alternate proposal could encourage the incentive of "bonus" payments if the use of large overweight trucks were kept to a minimum. Asking for two proposals and prices, one of which would be for light trucks, would enable the City to see the different collections prices and compare it to the cost of road deterioration/maintenance. Other advantages of using lighter, smaller trucks are that there should be fewer incidences of property damage and fewer trucks in a collection area (as a smaller truck can serve the narrow alleys and streets). It is unfortunate that we did not include this type of language in our current contracts. This issue was just not on our radar screen as we were preparing the RFP.

It will surprise no one who understands how things work in City government to learn that this gentleman retired, and those who replaced him were not of the same mind. In early 2007 they issued a new Request for Proposals that contained none of the promised improvements. In a June 29, 2007 letter to the Mayor, the City Neighborhood Council wrote as follows: "The waste disposal contract (now in negotiation) should include incentives to discourage City haulers from using a state exemption that allows their trucks to exceed that weight." Nevertheless, SPU proceeded to negotiate and in February 2008 announced a solid waste contract that contains no incentives whatsoever to discourage the contractor's loading of trucks to extra-heavy weights that, with every trip, will do millions of dollars in damage to Seattle's roads and bridges during the ten-year life of the contract. There is no evidence of any intervention on behalf of a more reasonable policy by SDOT, the Mayor, or the City Council.

*2. Describe how the issue is currently addressed in the Comprehensive Plan. If the issue is not adequately addressed, describe the need for it.*

Policy T-70 commits the City to "pursue strategies to finance repair of road damage from heavy vehicles in a way that is equitable for Seattle's taxpayers." However, the Comprehensive Plan lacks any provision to discourage road damage from heavy vehicles before it happens. It is not rational to be concerned about road damage from heavy buses but to do nothing to prevent it. It is even less rational that some of the damage is being done by sewer-cleaning vacuum trucks that are owned by the City, and by solid waste trucks that are under contract to the City. For the Comprehensive Plan to make any sense, it needs to be amended to add the proposed language.

*3. Why is the proposed change the best means for meeting the identified public need? What other options are there for meeting the identified public need?*

As mentioned in (2) above, the current language of the Comprehensive Plan addresses only paying for the damage, and not the need to prevent the damage. It is essential that the Plan be rebalanced. Of course, in addition, it would be desirable for the Mayor to issue an executive order and for the City Council to pass an ordinance or resolution, but this does not obviate the need to amend the Comprehensive Plan .

*4. What do you anticipate will be the impacts caused by the change in text, including the geographic area affected and the issues presented? Why will the proposed change result in a net benefit to the community?*

If the change is adopted quickly, it may cause the renegotiation of the new solid waste contract to produce an outcome that will avoid the unaffordable damage to roads and bridges that will be caused by the contract that has just been negotiated. This renegotiation will be a huge net benefit to the community, as the reduction in street damage will improve safety and reduce the costs of repair.

*5. How would the proposed change comply with the community vision statements, goals, objectives, and policies of the Comprehensive Plan? Include any data, research, or reasoning that supports the proposed amendments.*

The Comprehensive Plan is full of good rhetoric about proper stewardship of Seattle's capital facilities. This small amendment will give some teeth and meaning to the rhetoric. The data and research about street damage from extra-heavy buses and solid waste trucks was cited above.

*6. Is there public support for this proposed text amendment?*

Because of the cost of this unnecessary bus and truck damage to Seattle's roads and bridges, taxpayers will support this text amendment by a wide margin.