



April 13, 2006

RE: Nighttime Restrictions on Parking Area Sweeping in SLC

To Whom It May Concern:

A power sweeping contractor in your area recently contacted our office concerning Salt Lake City's investigation into a possible noise or time of operation ordinance that would apply to power sweeping. The following is an overview of the ramifications this would have.

There is no question that a restriction on nighttime sweeping that applies to parking area sweeping services is an ill-advised and expensive solution for a number of reasons. Although such an ordinance might appear to be solution, I assure you in the long term it will create many more problems than it solves. There will also be a significant toll upon the safety and cleanliness efforts of the entire SLC business community. Here is a 'quick primer' on sweeping that provides an overview to why this is true.

Because there are important reasons most parking area sweeping must take place at night, sweeping contractors perform their work largely out of the public's view. Most citizens, and even city managers and health officials, are barely cognizant of the activity of sweeping, let alone its many positive and necessary benefits.

Precisely because it takes place at night, city managers – and even the mall and business management customers of sweeping contractors – have little concept of the tremendous quantity of debris removed by sweeping. As a result, little to no thought is given to the tons of dirt, food, wrappers and other containers that are professionally removed and disposed of correctly on a nightly basis in a metropolitan area the size of Salt Lake City.

Primarily due to this lack of awareness, in combination with the noise that sweepers make (though certainly minimal by any daytime

standards), local sweeping efforts sometimes become the target of nighttime noise or operational restriction ordinances. However, because of advances that have been made in the last decade, noise complaints involving sweeper operation are actually extremely low.

Still, commercial properties are more frequently being located in the midst of residential areas. As a result, complaints from homeowners about noise from emanating from commercial properties at night are on the rise nationally. These complaints are typically the result of loud music from kids 'hanging out' in malls after hours, nighttime product deliveries, garbage disposal trucks and, much more rarely, the operation of power sweepers.

Fortunately, most incidences of individual noise problems with sweepers can be straightened out on a case-by-case basis through creative scheduling, operation without warning beacons flashing, powering down in certain areas, etc. A restriction of parking area sweeper operation to daytime hours, however, will create a host of other, largely unanticipated, problems.

Because of health and safety concerns, especially in regard to food debris, it is very important that all pavement surfaces be cleaned by an air sweeper on a regular basis. Nighttime hours are typically the only time when the absence of parked cars allows this process to be effective. Even if sweeping is done during low traffic times (during the day or early evening), the same areas tend to remain continually unswept. That's because shoppers and employees always park in the same spots, close to the entrance of the stores or their workplace.

Without regular sweeping, it doesn't take long before an unacceptable level of trash accumulates in these areas. If this were simply unsightly, the problem with this accumulation would be much less serious. Hand-collection of the debris would also be a viable option. However, as the discarded food portion of this debris decays it becomes a virtual magnet for trouble. Not only does it become a feeding ground for rodents and other animals, but also for health-threatening bacteria.

That's why the parking area sweeping industry is based around vacuum-based, not brush-based, equipment. That's because it's actually much more important to remove the smaller particles in the pavement surface than it is the wrappers, boxes, etc. that tend to cause citizen complaints.

Although hand-picking can be done to make pavement near entrances look cleaner, the small particles of food and other debris remain behind in cracks in the pavement. Power washing, a formerly popular cleaning method, is today seldom feasible given the size of most parking areas. Even where it is not, cost of water and the environmental impacts of washing this debris into storm water systems are prohibitive downsides. The expense associated with other methods of surface cleanup is also much higher than having a property cleaned via power sweeping.

Without air sweeping, there is soon an accumulation of small-micron materials. Here's why that fact is so important: Even though material of under 200 microns in width (as a comparison, a human hair is about 72 microns wide) typically comprise less than 10% of the total material on a roadway surface, over 60% of the total amount of the pollutants present that are targeted by the EPA in the Clean Air and Clean Water Acts —hydrocarbons, heavy metals and other potentially toxic substances from automobiles and other sources — are attached to those smaller materials.

If these are left on the pavement surface for the long term, there is an increased likelihood of toxicity developing from the area. Related ramifications include increased pollution in storm water runoff from unswept shopping centers and other business paved surfaces, as the more highly polluted runoff water goes into the waste treatment system. Worse yet, it pollutes the surrounding waterways of the city.

As this small-micron debris accumulates, it also tends to fill all the small cracks that characterize virtually any paved surface. This reduces friction, and thus traction, especially in wet weather. This especially impacts walkers and bicyclists. The decrease in friction, combined with more litter that will naturally accumulate heaviest near building entrances, will serve to dramatically increase the likelihood of slip-and-fall type accidents by shoppers, employees, etc.

If the city has imposed an ordinance that disallows power sweeping along the professional guidelines needed to do the proper job of cleaning, the city will likely find itself named as defendant due to slip-and-fall injuries. Prior to any restriction ordinance, this factor should be discussed in detail with the city attorney.

Those are the primary factors involved in the sweeping activity, per se. However, as a graduate level economist, I think it is important to outline the business economics related to this ordinance: In a city the size of Salt Lake, I estimate that over 100 jobs are tied to power sweeping, with an associated payroll in excess of a million dollars per year. Even without considering the multiplier effect on your economy of this level of payroll dollars, the impact of abolishing sweeping would be very substantial.

However, it doesn't stop there. The following would occur in addition to the previously discussed potential health hazards and increased likelihood of slip-and-fall accidents and related liability for these by the city:

1. An increase in the cost of maintenance of the interior floor surfaces throughout the city's businesses, as more grit is tracked from the parking areas into stores, etc. This added upkeep, which can be substantial, is eventually passed along to all consumers.
2. Less longevity for paint striping and other pavement marking in parking lots due to the higher level of grit continually on the surface. This cost is eventually passed along to all consumers.
3. Reduction in the level of business conducted. The largest factor determining where people shop is their perception of the cleanliness and overall attractiveness of a given store. Because the outer appearance of parking areas around the stores will degrade, as well as interior floor surfaces, a percentage of shoppers (especially those in outlying areas of the city) will choose to go to adjacent towns where there has been no impact on cleanliness by the noise ordinance. This will be felt by the City of Salt Lake as a decrease in its tax revenue base.

4. Because it won't take long for the general appearance of the business districts of Salt Lake to look shoddy, compared to cities where normal sweeping operations are allowed, over time there will likely be an impact upon the number of conventions that Salt Lake can attract. The convention industry is well connected, and word travels fast when something occurs in a city to reduce its beauty.

5. There will likely be an increase in the cost of storm water treatment, due to increased particulate levels in the water that arrives for treatment. This will include a higher level of hydrocarbon deposits and heavy metals. It may increase groundwater toxicity.

6. Finally, in terms of overall appearance and quality, Salt Lake City will soon become bereft of the beauty that has been one of its hallmarks to date. Without effective power sweeping taking place throughout the business community, there is simply no way for it to maintain a clean look or, more importantly, to actually be clean.

Now, for some good news: Fortunately, modern power sweepers operate at a decibel output that is well under OSHA requirements for noise, and one that very few nearby residents find objectionable even when the sweeping is being done at night. Usually it is only during hot summer months, when residents have open bedroom windows, that complaints are registered. By and large, the benefits of conducting regularly scheduled sweeping far outweigh this slight inconvenience to a very small minority of residents.

Power sweeper manufacturers are continually doing everything they can to reduce the noise of their equipment. This includes making available noise shields that dampen the sound output of sweepers. Due to the nature of the job being performed, however, a certain amount of noise is inevitable. It takes a powerful column of air to pull debris up from the pavement: If you take a look/listen for yourself, you will find that simply the air movement created by this action makes up a surprisingly high percentage of the sound of a modern sweeper.

The intention of our office in furnishing this letter is to enable those who might affect the decision-making in this regard in the City of Salt Lake to become better able to understand the role of power

sweeping in their community and in its economy. As a person in that position, I urge you to now go one step further and take a firsthand look.

Schedule an appointment with a local sweeping contractor to see for yourself how a modern sweeper operates. Ask them any questions that might help you in formulating your recommendation.

Also feel free to contact my office, from 9am to 5pm Pacific Time Zone, with any questions. You may also contact me directly via email. If you have Internet access, you will also find that our WorldSweeper.com website provides a host of additional information about the sweeping industry.

On behalf of the power sweeping community, as well as your own business community that relies so heavily on the many benefits of regular sweeping (whether they realize it or not), I urge you to consider all of the factors before recommending a course of action.

A nighttime noise ordinance that would restrict the efforts of sweeping contractors to keep the paved areas of the city clean is something with far-reaching negative implications for the beauty and competitiveness of Salt Lake City. Weigh carefully the factors, and you will surely discover the truth in that statement. There are many other ways to address individual instances of noise disturbance by a sweeper. Your local sweeping contractors are no doubt aware of these and, again, you may feel free to call on our office as well.

Sincerely,

A handwritten signature in cursive script that reads "Ranger".

Ranger Kidwell-Ross, M.A.
Editor, WorldSweeper.com

Ranger Kidwell-Ross has been involved with the sweeping industry for over 15 years. In 1988 he founded and, until its discontinuation at the end of 2004, was editor of the multiple award-winning American Sweeper magazine. Ranger founded WorldSweeper.com in June of 2005.