

October 17, 2017

Ms. Peggy Diaz

CT Department of Energy and Environmental Protection

79 Elm St.

Hartford, CT 06106-5127

**SUBJECT: Proposals for Modernizing the MIRA CSWS**

These comments are submitted on behalf of the fourteen member communities belonging to Bristol Policy Board, a regional waste management agency. We appreciate efforts by the Department to implement programs as directed under Public Act 14-94 to enhance recycling efforts and examine alternate technologies. Specifically, we address comments here to the recent draft Request for Proposals (RFP) calling for redevelopment of the Connecticut Solid Waste System (CSWS).

We request the Department of Energy & Environmental Protection explicitly communicate to the stakeholders and proposers that any projects developed as part of the procurement not disrupt or interfere with long term contracts for waste management services in cities and towns which are not part of the CSWS system. Municipalities are highly sensitive to actions by state agencies which potentially affect the cost of service. Clearly the redevelopment of the CSWS is a long-term, complex endeavor and given the critical mass of the overall project, there may be unintended consequences for other established programs as a result of this effort.

We are mindful of the broad statutory authority granted the Commissioner under

Public Act 14-94 to consider:

... (5) any potential positive impacts on the state's economic development...

and (7) any other factor consistent with the purpose of this section that the Commissioner of Energy and Environmental Protection deems relevant to the redevelopment of the Connecticut Solid Waste System Project.

Given such discretion over the procurement process, we respectfully ask the purview of the selection be constrained to prioritize waste management infrastructure deemed to be “in the best interest of the municipalities under contract with the Materials Innovation and Recycling Authority,” and not embark on an economic development effort subsidized by those cities and towns which derive no benefit from the procurement.

Also important is consideration of the project’s capacity. The challenge posed by miscalculating the ability of the existing infrastructure to manage waste generated within the state has unfortunately led to market disruptions and exorbitant costs associated with long wait times for trucks to tip loads, and hopefully this will be taken into account when selecting a contractor.

Sincerely,

Mark H. Bobman

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Executive Director