

I would like to submit the following comments on the Phase II proposals to modernize the CT solid waste management system. As a resident of Hartford, my perspective is biased towards ensuring the selected project promotes economic development and environmental justice for city residents. However, I also recognize DEEP has a responsibility to ensure adequate capacity for managing the state's solid waste over the term of the proposed contract period.

Covanta's proposal on surface would appear to be the preferred choice from the Hartford perspective, but there are concerns. Covanta essentially is proposing to privatize the waste management system. Since the final contract must be negotiated with MIRA, one might question whether MIRA would ever agree to eliminating its role, or whether DEEP or the CT General Assembly would agree to privatizing the system. A second concern is that abandoning the South Meadows site was viewed as a host city benefit (in lieu of an y PILOT payments) , but the actual benefit depends on remediating the land to make it available for development. I would argue that Covanta should still be responsible for PILOT payments to help the City fund necessary studies and secure funding for remediation of the site. These payments could then decline and eventually end as the site is actually put on the market for economic development.

The issue of PILOT payments applies to all the proposals. The suggested \$4 million PILOT was based on potential property taxes that would be available from a developed site. None of the proposals gave adequate information on expected truck traffic or other emissions to make an informed assessment of the actual costs imposed on Hartford by hosting the waste management facilities. There are methods to estimate the externalities imposed by each proposal, and such studies should be commissioned to help inform an appropriate PILOT. It is also important to establish a transparent process for the negotiation of the PILOT amount between the selected vendor and MIRA. This process should be guided by the state's environmental justice statute and should extend for the duration of the contraction, not a once and done stakeholder engagement exercise. There should be an annual community review process to discuss actual impacts imposed on the City, including both lost tax revenues and externalized social costs.

Another issue with the Covanta proposal is that the estimated diversion rates are dependent on optimistic assumptions about resident participation in a curbside collection system for organics. It was not clear whether Covanta's proposal to convert the Murphy Road MRF to a transfer station would include advanced sorting equipment (similar to what was proposed by the other two vendors) capable of recovering organics from the mixed municipal waste. This appeared to be an option that could be selected instead of source separated organics via the curbside collection. Given the time it will take to deploy the curbside collection system and to educate and enroll residents, it would seem prudent that the advanced sorting system should be included with or without the curbside collection. However, the treatment of these organics at existing facilities in the state would require permit modifications. Failure to achieve the assumed participation rates would mean more waste to incineration or shipment to out-of- state landfills.

Thus, it seems to me DEEP would have a strong preference for the Mustang proposal. (There would be no advantage to selecting Sacyr Rooney, since its proposal was similar to Mustang's and had additional problems – such as continued incineration in Hartford and some questionable calculations on its diversion rates.) This proposal will place additional stress on the PILOT negotiations, since Mustang proposes Hartford will still host a significant amount of the state's waste treatment capacity & will

actively be marketing to expand the amount of waste treated. On the plus side, the Power Block Facility will be made available for repurposing, which would be much easier than demolition and remediation of the entire site. The advantages of eliminating the incinerator would need to be weighed against the health impacts of increased truck traffic.

Despite some concerns about the Covanta proposal, I still recommend their selection. I prefer a distributed solution to managing wastes. Concentrating treatment in Hartford creates unnecessary truck traffic across the state, but particularly in Hartford's South Meadows. There exists modular technology for efficient treatment of MSW (e.g. gasification, pyrolysis), which could be deployed at multiple sites. These technologies also tend to be flexible and could adapt to a changing waste stream. Modular and distributed treatment would also be more resilient to upsets and easier to match to uncertain future waste stream, both mix of material types and amount.

Thank you for your efforts to make the public aware of the proposals.

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