

March 7, 2024

Esteemed Chairs Lopes and Gresko,
Members of the Environment Committee:

The Western Connecticut Council of Governments (WestCOG) appreciates the opportunity to comment on Raised Bill 293, *An Act Concerning Municipal Solid Waste Management*:

Section 1 of the bill would instruct the Department of Energy and Environmental Protection to undertake a waste characterization and needs assessment. WestCOG **supports** this section. Understanding a problem is half the solution. Unfortunately, the situation in which the state finds itself regarding municipal solid waste is one where the problem is not well understood: the system is complex, and data are hard to come by. Section 1 will collect and synthesize the information needed to define the state's waste problem, thereby enabling the development of solutions that are appropriate to the problem and that have a high probability of success if implemented.

Section 2 of the bill would raise the weight limit for vehicles using the state's roads and bridges to 100,000 lbs., if they are hauling solid waste or recyclables. (Currently, the only vehicles that may exceed the state's general 80,000-pound weight limit are milk tankers and vehicles carrying agricultural commodities). This change:

- May improve the efficiency of waste transport, reducing the number of heavy trucks on the state's roads and bridges (since each vehicle can carry more), mitigating air pollution and greenhouse gas emissions as well as controlling tipping fees (and thus property taxes or trash collection fees paid by the state's residents and businesses).
- Will increase wear and tear on roads and bridges, raising maintenance costs and shortening the lifespan of infrastructure. As a rule-of-thumb, the damage to a road is proportional to the fourth power of the axle load. For a typical 18-wheeler, raising weight limits 25% from 16,000 to 20,000 lbs. per axle could result in nearly 250% as much damage per truck.

Connecticut's highway use fee may compensate for the additional costs to state roads and bridges resulting from higher weight limits, as the fee varies by vehicle weight. This ensures that heavy trucks pay for the damage they cause, with those over 80,000 pounds paying the highest rate, corresponding to their outsize impacts to transportation infrastructure.

Should the state allow heavier trucks, WestCOG asks that it also consider the impacts to local infrastructure. With the closure of the MIRA plant, waste exports from Connecticut have grown. This means more heavy trucks not only on state roads and bridges but also on local roads and bridges, especially those leading to and from transfer stations. Given that the highway use fee is assessed statewide – for travel on state and local roads – WestCOG suggests that **funds be made available to maintain local infrastructure that serves and is degraded by heavy truck movements.**

Thank you for your consideration.

A handwritten signature in black ink that reads "Francis Pickering". The signature is written in a cursive style with a long horizontal stroke at the bottom.

Francis R. Pickering
Executive Director