October 24, 2023

To: Caspar Transfer Station Joint Coordinating Committee

Subject: \$400K Improvements at Caspar

I am surprised (and disappointed) that SWOW is asking you to approve a \$400K upgrade to the Caspar Transfer Station. I recommend you either disapprove of it entirely or, at a minimum, require an independent study to assess what improvements are *really* necessary for the short-term (2-5 years) or long-term (5+ years – a Central Transfer Station gets built) for the following reasons:

1) SWOW is in serious negotiations with C&S to be sold. If C&S takes over, everything is up for grabs. They, with greater financial backing, will likely do a total review of not just Caspar's self-haul operations but the entire Coast garbage situation, including integration with curbside pick-up operations. A renewed serious push for a Central Transfer Station is also likely. It is foolish to even consider changes to Caspar at this point until ownership is settled. One can only but wonder if securing this \$400K from the Caspar Funds, at this point, is only desired to help sweeten the deal.

2) The proposed litigation – concerning Waste Mgmt/Pudding Creek site – also changes everything for the future. If Pudding Creek can become available for a state-of-the-art all operations Central Transfer Station – something economically and environmentally beneficial and worked for since 2003 --- then, again, no "improvements" should be done at Caspar until that becomes clearer.

3) Those "Caspar Funds," now \$300K, that have been collected since the early 2000's were expressly created for studies and acquisition of a new Central Transfer Station – NOT for operations or improvements at Caspar. They should remain intact for future Central Transfer Station studies and creation.

Just like maintenance expenditures, if improvements are ever needed at Caspar, they should be funded by its operator, gate fees, and/or city-county general funds ---- not the Caspar Funds piggy bank. There may well be legal problems using those funds for unintended facility upgrades also. 4) The current operations at Caspar are "just fine"...no urgent need for improvements exists. First, needing answering is, so why the upgrade request?...what's the need – benefit?

Then, second, SWOW's proposal – just paving the ramp and building a roof – at \$400K seems outrageous. More importantly, its benefit is not addressed. How much "efficiency" (cost-savings) will be achieved? How long will it take for that investment to pay out? Is that paving/roof even necessary?....what alternatives are there? Why is the fact that right now ½ of all garbage being hauled in the much more efficient possum-belly trucks (obviating the need for ramp-efficiency improvements) not mentioned? None of these questions were addressed in the proposal.

Lastly, it has been generally recognized, over the years, that SWOW's operations are "loose" and costs/numbers provided frequently wildly inflated. IF the JCC down the road decides that improvements at Caspar are needed – *and* paying for them from the Caspar Fund is both legal and warranted – <u>then a full-scale cost-benefit analysis by an independent outside party should – *must* I would say - be done first.</u>

I hope you will either dismiss or table SWOW's proposal until all these issues are addressed.

Sincerely,

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