

From: [Sunset Advisory Commission](#)
To: [Elizabeth Jones](#)
Subject: FW: Public Input Form for Agencies Under Review (Private/Before Publication)
Date: Monday, June 27, 2022 3:12:33 PM

From: Texas Sunset Advisory Commission <sunset@sunset.texas.gov>
Sent: Monday, June 27, 2022 1:34 PM
To: Sunset Advisory Commission <Sunset.AdvisoryCommission@sunset.texas.gov>
Subject: Public Input Form for Agencies Under Review (Private/Before Publication)

Submitted on Mon, 06/27/2022 - 11:30

Submitted by: Visitor

Submitted values are:

Choose the agency that you would like to provide input about
[Texas Commission on Environmental Quality](#)

Public Comments

1

First Name

Barbara

Last Name

Coombs

Title

Owner

Organization you are affiliated with

Environmetnal Benchmarking LLC

Email

City

Austin

State

Texas

Your Comments or Concerns

Landfills currently share consolidated numbers for tonnages that are disposed. This does not help generate an accurate Garbage Per Capita number for cities or counties or even for the COG's when a landfill - for example Itasca landfill serves over 14 counties. The garbage is then all attributed to the HOTCOG in the Municipal Solid Waste in Texas annual report issued by TCEQ. This is a valuable report and should be maintained - I am also concerned that if Burns and Macdonald is allowed to manage or participate in the publication of this report they will delete the reporting of Garbage per Capita. They generate a sizable revenue stream for their company by selling the software to track all of the recycling (a material that is already outside of the landfill). Cities pay \$11,000. per user or per copy for this software. Cities can identify more accurately their waste minimization practices by using Garbage per Capita. Burns and Macdonald is not on the same page with this viewpoint. To measure GPC - only two numbers are needed - population and tons of garbage generated. If the City of Austin was tracking their garbage per capita - they would know that in 2011 when solid waste legislation was passed for the city - their GPC was 5.2 pounds per person per day. Today it is over 6 pounds! GPC helps to identify what programs are working most effectively. The national average is 4.5 pounds per person and Texas is at 7.2 pounds per person. If we really want to move ahead without spending much money - create a friendly competition to reduce the garbage per capita.

The way we measure water use (water conservation) is gallons per capita, the way we measure energy use is KWh per capita or Btu per square foot, So, why - really WHY? are we measuring waste by not measuring waste - but measuring the recycling - a complicated and ineffective and expensive exercise.

The TCEQ publication is one of the few publications in the state of Texas that measures Garbage per Capita by the councils of Government. I would like this reporting to continue and the accuracy to improve. Thank you

Please make a more concerted effort to open up the bids to more consultants than Burns and Macdonald. Allow more time for the consultants to respond.

Your Proposed Solution

Ask Landfill owner/operators to report the tons delivered/ disposed at their site by either county or city or zip, whatever works well for them. we can extrapolate the data from there based on population. But, reporting a consolidated number of all of the tons disposed in the landfill - is not acceptable. It would be ideal to see this reporting on their website - similar to the www.ntmwd.com/our-solid-waste-system/. Which serves the cities of Frisco, Allen, Plano McKinney and Richardson, When these five cities knew what their GPC was - within two years the city that was in last place reduced their GPC by 15.5%!!! I have attached an article based on this comparison. It does not show the analysis done two years later. Please call me if you have any questions. 512-633-5202 and leave a message. Also, please expand your base of consultants to the state of Texas. Burns and Macdonald has too much influence and is too tied to practices that are not always in the best interest of Texas. FCC, a foreign company, has a stronger hold in Texas thanks to Burns & Mac and the plants are often oversized - causing some of the local facilities to close or go out of business,

Attachment

[Frisco Style Magazine_GPC_Coombs.docx](#) (70.64 KB)

My Comments Will Be Made Public

Yes