

September 7, 2023

To whom it may concern:

RE: Comments to the 2022-2042 Draft Metropolitan Solid Waste Management Policy Plan

The City of Minneapolis Public Works Department appreciates the opportunity to comment on the 2022-2042 Draft Metropolitan Solid Waste Management Policy Plan. In general, our office strongly supports the waste management hierarchy and agrees with the emphasis put on waste reduction and reuse in this draft plan. Many of the strategies and goals closely align with the City's Zero Waste Plan and Climate Equity Plan (adopted Dec. 2017 and July 2023 respectively).

Although this plan sets requirements on the metro counties, we expect there would be increased requirements on cities as well. We have three primary concerns with the draft plan.

1. **Full implementation costs not included.** We do not feel the added costs to residents and businesses to implement the required strategies were fully taken into consideration. Over the past several years the cost of doing business has become much more expensive due to increases in employee wages, disposal and processing costs, and truck and equipment costs. Requirements to implement several of the strategies in the draft plan would mean additional significant increases in costs to our customers.
2. **Lack of flexibility.** Strategies that specify a method, frequency, etc. often limit the flexibility needed to be innovative. In past Metro Policy Plans, the State has allowed more flexibility for counties to propose new and innovative projects and programs. Strategies should focus on the goal to be accomplished rather than specifying how to implement a project/program.
3. **Additional funding needed.** While we are pleased additional SCORE funds were re-directed from the General Fund to the Environmental Fund in the 2023 Legislative session, this reallocation is not enough. The MPCA and all stakeholders should continue to push the legislature to allocate all SCORE funding to its intended purpose.

The remainder of our letter details comments and concern about specific strategies included in the draft SWMP.

Strategy 28. Collect recycling weekly by 2025.

- We do not support this requirement because it will significantly increase costs to our customers. At a minimum it would require purchasing eight new collection trucks, hiring 16 new employees and increase costs from our collection contractor, Minneapolis Refuse Inc, who provides collection services to half of our customers.

- Currently, households can request additional recycling carts at no extra cost. They can also set out extra recycling next to their cart as needed at no additional cost. There are many households who have more than one recycling cart, and also many households who do not set their recycling carts out for every collection.
- We think the timeline proposed in this strategy is not feasible. We are unlikely to hire the additional staff because, like the rest of the solid waste industry, we have had difficulty filling existing vacant positions. Also, the current timeline to acquire an additional vehicle is more than a year from the date of purchase until that vehicle is on the road.
- In addition, we do not have space to park eight new trucks at our office nor does our contractor, Minneapolis Refuse, Inc. Obtaining additional space to store vehicles would result in increased costs that would be passed on to our customers.
- Switching to weekly recycling could result in increased emissions for decreased materials and decreased revenue. A Recycling Refund (bottle) bill is expected to be introduced at the State legislature this coming session. If a bottle bill passes, there may be significantly fewer bottles and cans – the higher value materials – in recycling carts. Switching to weekly recycling would result in increased emissions for decreased materials and a decreased city revenue share.
- We recommend amending this strategy to increase education and awareness that additional recycling carts can be obtained by contacting the city or hauler.

Strategy 34. Establish mandatory pre-processing of waste at resource recovery facilities and landfill by 2025.

- We cannot express support for this strategy until we understand the full impact. Does the State want to require the removal of certain material types or want a full ‘dirty MRF’ to remove as many recyclable materials as possible?
- Added transportation costs, infrastructure costs for pre-processing, increased tipping fees, etc. will result in significant cost increases for our customers.

Strategy 38. Expand backyard composting outreach and resources for residents.

- While we support backyard composting this strategy is too prescriptive. It explicitly states a bi-annual (twice a year) mailing to residents about backyard composting. We already send an annual mailer to residents about our collection programs and share resources to find more information about how to reduce waste, reuse and recycle, and increase composting. To send a second city-wide mailing each year is a minimum \$100,000 added cost.
- Greater flexibility should be given to how promotions can be completed. Email communications, social media, and events are all as effective as direct mailings. Often times they are more effective and significantly less expensive.

There are several strategies that explicitly mention cities. Therefore, we assume that city responsibilities would increase if the County selects certain optional strategies. Our comments on optional strategies are as follows:

Strategy 20. Implement a county policy encouraging all county and city-led events and food providers use reusable food and beverage service ware.

- Please clarify this strategy. Has the State implemented a similar policy for State-led events? What is the definition of a county and city-led event? If the ordinance is to ‘encourage’ all county and city-led events to have reusable containers it seems unlikely many county or city events will comply with the ‘encourage’ language. There are many City-sponsored events where this is not feasible at this time (e.g. Aquatennial, Open Streets Minneapolis, Holidazzle, etc.).

Strategy 21. Adopt an ordinance with a mandatory consumer charge for take-out single-use cups, containers, and utensils.

- If selected, counties would likely make this a requirement for cities. The City of Minneapolis’ Bring your own Bag ordinance is referenced in the description of the strategy, however that ordinance is on carryout bags, not on containers. Additionally, the strategy states that all to-go containers should be compostable. The City’s Green to Go ordinance requires foodservice containers to be reusable, recyclable or compostable, but does not have a fee associated nor does it include utensils.
- The cities of Minneapolis, St. Louis Park, St. Paul, and Edina have packaging ordinances that require to-go packaging to be reusable, recyclable or compostable. This strategy should be modified to apply these requirements to the entire Twin Cities Metro area.
- Minneapolis would appreciate MPCA’s support of repealing Minnesota Statutes, Section 471.9998, Merchant Bags, which preempts local units of government from banning single-use bags and advocate for a state-wide fee and/or bans for certain single-use items.

Strategy 24. Establish a reuse location for residential drop-off and pickup.

- We support the idea of a reuse location for residential drop-off and pickup. The City applied for a USEPA Solid Waste Infrastructure for Recycling (SWIFR) grant in February 2023. If our project is selected, we will modify our North Transfer Station into a new residential resource recovery facility. We will model it after our South Transfer Station operations but with more reuse and recycling opportunities.
- If we do not receive the SWIFR grant, and counties push these requirements onto cities, it should be noted that we would require additional funding to develop and monitor a residential drop-off location and program of this nature.

Strategy 25. Establish a curbside set-out day to allow residents to set out used items for reuse.

- This strategy is too prescriptive and would be a new service and require additional employees and vehicles. In our large item collection program residents set items out on the same day as their regular pickup day. In 2020 we began to evaluate the quality and quantity of large items set out for waste pickup in an effort to gather data to potentially start a reuse program. We unfortunately had to stop the evaluation due to staffing shortages. We plan to resume the study this fall.
- Nothing in this strategy promotes existing exchange platforms like Buy Nothing Groups and NextDoor. We recommend amending this strategy or adding a new optional strategy to have counties and/or cities actively promote existing, well-functioning reuse platforms and donation centers.
- For cities whose haulers have automated collection, this will likely result in significant increased costs for customers if the haulers are expected to pick up items not taken by other residents. As

these items are not likely to be collected using automated collection vehicles, it would require the hauler to use a separate truck.

Strategy 56. Encourage Retailers to increase consumer awareness of responsible end-of-life handling for products containing lithium-ion batteries.

- We support this strategy because Lithium-ion batteries and the fire hazards they pose are a huge concern for all in the waste and recycling industry. Please consider evaluating the legal feasibility of requiring large sellers of rechargeable batteries to start a collection program for used rechargeable batteries. Stores should include at least the following: big box retailers, hardware stores, tobacco and cannabis retailers.

Strategy 59. Host monthly drop-off sites in locations other than a permanent HHW site.

- This strategy is too prescriptive and very costly to implement. Instead, the strategy should list a total number of events that is reasonable to accomplish throughout the year. County staff have commented that there are not enough HHW event staff trained to hold a monthly event in each metro county throughout the year. Furthermore, a HHW drop-off event in the winter months may not be worth the effort and cost.
- Alternatively, the strategy could be changed to develop grant programs and/or increase partnerships with other locations (retailers, community organizations) to accept select HHW materials from their community throughout the year. This would be a more effective option to increase diversion of HHW than monthly drop-off events.

We want to reiterate our support for the goal of this draft Metro Solid Waste Management Plan to move materials up the waste management hierarchy. We recommend the MPCA reevaluate the full implementation costs to residents and businesses by reviewing what is required and what is optional. We think additional flexibility should be incorporated to meet the goals of the strategy.

We are happy to answer any questions you may have about these comments. Thank you for your consideration.

Sincerely,



Margaret Anderson Kelliher

Director, Minneapolis Public Works Department