



**Carver County  
Board of Commissioners**

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September 5, 2023

Commissioner Katrina Kessler  
Minnesota Pollution Control Agency  
520 Lafayette Road North  
St. Paul, MN 55155

Dear Commissioner Kessler,

On behalf of the Carver County Board of Commissioners, thank you for the opportunity to provide comments on the draft Metropolitan Solid Waste Management Policy Plan 2022-2042 (Plan). Carver County values the waste management planning work being completed by MPCA staff and offers the comments in this letter for your consideration.

**Solid Waste Abatement Objectives (pg. 14):** The Plan sets quantifiable mixed municipal solid waste (MMSW) objectives for abating the need for and practice of land disposal for the Twin Cities Metropolitan Area (TCMA) region over the next 20 years.

Organics

*The intended outcome of the MPCA organics compost site rule changes in 2014 was to expand organics composting capacity in the TCMA, however, the goal of adding composting capacity has not been realized. The Shakopee Mdewakanton Sioux Community Organics Recycling Facility in Scott County will add capacity as it moves to a new location in 2024, yet additional sites will be needed to ensure capacity is available to meet the organics objectives identified in Table 3 and Table 4 of the Plan.*

*Given that it's been 10 years since the completion of the organics compost site rule changes, County staff recommends the MPCA revisit the rules once again to eliminate the barriers to siting a new organics compost facility, while still protecting the environment.*

Waste To Energy

*Carver County's opportunity to increase landfill diversion through waste to energy is limited by local facility capacity, waste designation, private hauler business decisions, and the County's geographic distance from existing facilities. Due to these factors, it will be difficult for the County to meet the MMSW management system objectives identified in Table 3 of the Plan.*

**County Solid Waste Plan Evaluation Point Structure (pg. 19):** The Plan allows for counties to design and modify their own solid waste programs through the introduction of optional strategies. Each strategy has been assigned a point value, which is added to the total amount of points the county must achieve for approval of their County Solid Waste Management Plan by the MPCA.

*Carver County appreciates the flexibility to choose optional strategies that will best align with County priorities. However, the County would also like to see the Plan include a point calculation process for counties to propose alternative strategies that support the key themes of the Plan. For example, Carver County would propose to design and implement a Tool Lending Library program, thereby providing*

residents with the opportunity to borrow home and garden tools for personal use, while reducing their environmental footprint.

**Required Strategies:**

Strategy 1: Increase compliance with Hauler reporting per Minn. Stat. § 115A.93 (pg. 20).

*Carver County supports increasing compliance with hauler reporting but does not support requiring proof of data submittal prior to license renewal by the County. In addition, the County recommends hauler reporting compliance be a state led initiative to provide a uniform regulatory approach across the TCMA.*

Strategy 28: Collect recycling weekly by 2025 (pg. 29).

*A weekly recycling requirement will likely receive resistance from haulers and some residents, as it would increase truck traffic and significantly increase the cost of curbside recycling. Many haulers already offer a second or third recycling cart to customers at no additional cost. County staff recommend the MPCA allow the practice of haulers offering additional carts at no cost as an alternative strategy, as it will increase recycling without increasing costs to the resident, and it will not negatively impact the environment or local infrastructure.*

Strategy 29: Collect recyclables, organics, and trash on the same day (pg. 29).

*This is likely already happening County-wide; however, the County may see some hauler opposition to it being listed as a requirement.*

Strategy 37: Make residential curbside organics collection available in cities with a population greater than 5,000 (pg. 34).

*County staff support this strategy as we have received numerous requests for curbside organics collection to become available, however, the County may see some hauler opposition to it being listed as a requirement.*

Strategy 42: Promote existing programs that use EAB-affected wood for furniture, home goods, flooring, and other purposes (pg. 36).

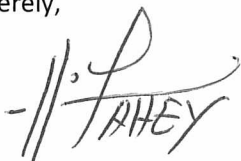
*Carver County recommends this be a state led initiative managed through the existing MPCA recycling market development program.*

Strategy 60: Implement the use of a Building Material Management Plan (pg. 45).

*Carver County can develop a management plan for its own facilities but does not have authority to require use of the plan for non-county projects or other publicly owned buildings.*

Once again, thank you for providing Carver County the opportunity to comment on the draft Metropolitan Solid Waste Management Policy Plan 2022-2042. We look forward to a flexible Plan that will allow for the most effective strategies to guide our County Solid Waste Management Plan.

Sincerely,

A handwritten signature in black ink that reads "John P. FAHEY". The signature is written in a cursive style with a large, stylized initial "J" and "P".

John P. Fahey, Chair  
Carver County Board of Commissioners

Cc: Carver County Board of Commissioners  
Greg Boe, Carver County Environmental Services Manager