

## Metro Area Solid Waste Management Plan Comments

Minnesota Pollution Control Agency  
c/o Peter Sandhei  
520 Lafayette Road N.  
St. Paul, MN 55155

Dear Peter,

Please accept these comments regarding the metro long range policy plan for solid waste management (MPP).

First and depressingly, this plan falls woefully short of a true long-range plan – a 5% waste reduction goal by 2042 is incredulous and would be laughable if it were not so saddening and frustrating. Over-consumption and our throw-away society is the biggest reason we are facing the two greatest threats to humanity (and the rest of the planet we have evolved with) the extreme loss of biodiversity and climate chaos. Hyper consumption drives the climate crisis. We need to see and understand the crisis we are in!

The citizens of this state rely on our public agencies like the Minnesota Pollution CONTROL agency to be true leaders; be honest about this need, educate us all, and be the bold leaders we need you to be here in 2023 to transition us out of the mess. Help us to become “people” again, part of an Earth community – not just brainwashed (by industry) “consumers.” I urge you to be ambitious when planning for our future – the future health of the public and our environment in Minnesota.

1. We need a real plan for waste reduction – 75% by 2042
2. We can no longer condone garbage incineration in a populated community due to extreme health risks to people – the Hennepin Energy Recovery Center - HERC must be shut down
3. Community Engagement Process must be real and incorporate Environmental Justice
4. Recycling must be true recycling – not just collection, but actually result in useable new products  
Put GREAT emphasis on Policy 36. Support and invest in new facilities and retain processors of recycled material for end markets. Establish a directory of processors throughout the state. Dedicate staff resources to assisting and connecting local processors that prepare collected material for end markets to manufacturers. Processors need to maintain and upgrade equipment to be competitive. Investing in new and upgraded facilities is a benefit to the local recycling market and supports the economy.

### **Waste Reduction:**

We need a waste REDUCTION goal of 75% to begin to really address the “Twin Cities is bulging with trash” crisis and match many other cities and countries. The country of Canada has a goal of 50% by 2040. Hawaii is 70% by 2030 for ... goodness sake. New York is 85% by 2050. YOU are so woefully behind as to actually be going backwards. In fact, with only a 5% waste reduction goal, total tonnage will continue to increase.

We must have a goal that is in line with the United Nations Sustainable Development Goals, set a goal of at least 50% waste reduction by 2030 and 75% or more by 2042, as well as 90% diversion by 2042.

I have reduced my waste to the greatest extent I am able, I do not buy anything that has too much packaging, I recycle all that I am able, I compost and most importantly buy used, reduce – do not buy

what I do not need, and reuse. I am only one household but with your leadership and educational support so many more could do this.

The MPP shows great graphics for how REDUCTION is the best policy – but the Plan is not giving this the emphasis and priority it truly should. With a goal of 75% - the focus and energy would be behind strategies and measures that could achieve this. With this in place it would be the bold transition we truly need from our government.

Strategies I wholeheartedly support:

- Make residential curbside organics collection available in cities with a population greater than 5,000
- Educate restaurants and other establishments that have excess prepared food to donate
- Adopt an ordinance with a mandatory consumer charge for take-out single-use cups, containers, and utensils
- Establish a reuse location for residential drop-off and pick-up. Incentivize deconstruction over landfilling garbage and demolition debris
- Repair Ambassador program, and reuse networks
- Collect recyclables, organics, and trash on the same day, which is in place in my city of Bloomington.

**ADD:**

- Ban single use plastics (straws, dishes, cups, utensils) that are not made of compostable materials

**Close the HERC:**

The plan says: “The MPCA understands and acknowledges the concerns of potential impacts expressed by residents near WTE facilities. The best way to address these concerns is to actively pursue strategies that result in more waste reduction, reuse, recycling, and organics recovery. Once a system is developed that does not need to rely on WTE facilities, then it would be appropriate to look at taking them off-line.” This language confirms that the MPCA does not take those concerns seriously and does not acknowledge the harm that toxins from the incinerator have been proven to cause. You are not taking this seriously! Without a deadline I know our government will not move forward, will not seriously implement the changes and transitions needed, and will slow drag any progress.

Without a “deadline” there is no incentive, momentum, or concerted effort to find alternatives.

I do not want what little solid waste I still must put in the waste stream to risk the health and lives of people! I no longer want to have to support the HERC – please put a deadline to this deadly process of “managing” waste and find alternatives – reduce waste by 75% by 2042, and further secure our landfills to the highest standards (as has been done in many other communities!) to support this transition.

The toxins that are generated daily include, but are not limited to: lead, NO<sub>x</sub>, Sulfur Dioxide, PM<sub>2.5</sub>, and PM<sub>10</sub>, PFAS, Arsenic, Mercury, dioxins. Chronic exposure to fine particulate air pollutants (PM<sub>2.5</sub>) and nitrogen dioxide (NO<sub>2</sub>) may increase non-lung cancer risk in older adults. Anyone who lives near the incinerator is chronically exposed to these emissions. Simply because the emissions “meet EPA standards,” does not mean they are not adding to other existing exposures from cumulative impacts.

Incinerators are an outdated and unsafe method of managing waste. MPCA acts as though science is settled. Instead, experts and scientists increasingly agree that incinerators are in fact dangerous, and

worse than landfills, especially when health impacts are considered. More studies are making clear the [health impacts of incinerators](#), especially on those living nearby.

The MPP's "Goal 1: Protect and conserve. Manage materials in a manner that will protect the environment and public health, reduce greenhouse gas emissions, conserve energy and natural resources, and reduce toxicity and exposure to toxics" clearly states that burning garbage is unacceptable – IF we are to reach this Goal. Why put this in the plan if you do not plan to achieve it?

Enough is enough – put a deadline on the HERC at the end of the present contract – 2025. There is no 'healthy' consumption of these toxins. No exposure is far better than any exposure, and even a small exposure is cumulative to what already exists in a major city. We have safer solutions to dealing with waste.

### **Community Engagement Process must be real and incorporate Environmental Justice**

Policy 7 under Goal 1: "Policy 7: Increase public participation in decisions that impact them with special emphasis on Environmental Justice" – has NOT been achieved in this planning process and must be given a greater priority in the ongoing implementation.

This whole process was taking place in the middle of the summer, with only one meeting per county (6 total) half during the day when people are at work, only 2 in person (St. Paul + Brooklyn Park) - to say that's meaningful public engagement that's really going to reach beyond the industry professionals who were at the previous meetings, and a few highly engaged residents is just not realistic

The engagement plan for this Solid Waste Management plan needs to specifically target communities impacted by environmental injustice and make those meetings more accessible by offering them at different times of the day, including translation into different languages, and partnering with organizations that work, and live in the aforementioned areas.

Add another Policy to this Goal: Policy 10: Train MPCA staff on what Environmental Justice is – so that it can truly be applied in all decision making regarding solid waste management.

Thank you for the opportunity to comment on the MPP,

1. Again: We need a real plan for waste reduction – 75% by 2042
2. We can no longer condone garbage incineration in a populated community due to extreme health risks to people – the Hennepin Energy Recovery Center - HERC must be shut down
3. Community Engagement Process must be real and incorporate Environmental Justice
4. Recycling must be true recycling – not just collection, but actually result in usable new products.

Sincerely,

Lois Norrgard/ Bloomington MN