

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

September 15, 2023

The City of St. Louis Park Public Works Department appreciates the opportunity to comment on the 2022-2042 Draft Metropolitan Solid Waste Management Policy Plan. We support the waste management hierarchy and are pleased to see the draft 2022-2042 Metropolitan Solid Waste Management Plan (MSWMP) has a focus on waste reduction and reuse. Although many of the strategies and goals align with those in the city's strategic priorities and Climate Action Plan, we have 3 primary concerns:

- More clarity is needed in strategies
- Strategies should consider increased costs to residents and businesses
- Strategies are overly prescriptive and should allow for alternative strategies that meet the same goals

Below are comments and concern about specific strategies included in the draft MSWMP (both required and optional):

Strategy 4: Improve recycling data collection at businesses within the county

If the county decides to adopt this strategy, it will likely be pushed onto the cities, which would result in a significant amount of additional work to what is already a demanding reporting period. Instead, this should be a state-led strategy. The city also proposes that this strategy be amended to include the requirement of a "recycling manager" at each commercial entity, including multi-family properties, that is responsible for reporting this information to the state.

Strategy 17: Work with health inspectors to educate restaurants and other establishments that have excess food to donate.

This strategy should also include food-to-animal and/or composting for inedible portions of food.

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 what is included as a "city-led event". There are many city-sponsored events where this is not feasible. The city partners with other organizations on many events, and does not have control over vendors, location, etc. In addition, in many cases where utilizing reusables at events has been successful, the organizer has had complete control over entrances/exits, disposal methods, etc. which is simply not the case at city events.

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 strategy states that all to-go containers should be compostable. The City of St. Louis Park's zero waste packaging ordinance requires foodservice containers to be reusable, recyclable or compostable, but does not require food establishments to charge a fee to customers. We feel that this unfairly prioritizes compostables, when, in certain cases, there are perfectly viable recyclable options. In addition to St. Louis Park, Minneapolis,

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, without a fee to customers. Ensuring equitable impacts of fees is challenging. Many factors need to be taken into consideration before determining if such a policy would not cause overly burdensome impacts on lower-income communities in particular.

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, potentially requiring a separate contract and an additional hauler, increasing cost to residents. In the city's current bulky item collection program residents are able to set items out on the same day as their regular pickup day, by calling the hauler ahead of time. The city also allows residents to bring bulky items to annual cleanup days, where many of the items are diverted for reuse. Nothing in this strategy promotes existing exchange platforms like Buy Nothing Groups and NextDoor. The city recommends 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.

Strategy 28: Collect recycling weekly by 2025

We do not support this requirement for a variety of reasons, including ongoing staffing shortages and increase in cost to residents. Currently, residents in the city can request additional recycling carts at no extra cost.

We think the timeline proposed in this strategy is unrealistic. We just finalized a new 5-year collection contract, and adding additional routes would 1) require an addendum to the contract and a new round of contract negotiations, and 2) increase costs for our customers.

In addition, waste haulers have had difficulty in hiring and maintaining enough drivers as it is to fulfill current contract obligations. Asking them to add additional routes would only further exasperate that problem.

Switching to weekly recycling could result in increased emissions for decreased materials and decreased revenue. 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.

The city cannot express support for this strategy until we understand the full impact. Added transportation costs, infrastructure costs for pre-processing, increased tipping fees, etc. could result in significant cost increases for residents.

Strategy 37: Make residential curbside organics collection available in cities with a population greater than 5,000

More clarification is needed from the state on whether Minn. Stat. 115A.93, subd 3(c) includes multifamily properties.

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

While we support backyard composting this strategy is too prescriptive. It explicitly states a biannual (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.

Greater flexibility should be given to how promotions can be completed. Email communications, social media, and events are all significantly less expensive.

Strategy 40: Standardize the role of compostable products in organics recycling programs by 2025. More clarity is needed on what “the standardization of compostable products” means. The sentence about the Oregon study is taken out of context for the purposes of ‘standardizing compostable products,’ and leads to confusion as to what the goal of this strategy is.

We appreciate the opportunity to comment on the draft MSWPP 2022-2042. We want to reiterate our support of the increased focus on waste reduction and reuse, and the waste hierarchy, but recommend the MPCA reevaluate the full implementation costs to residents and businesses by reviewing what is required and what is optional.

Sincerely,

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