



September 17, 2023

Katrina Kessler
Commissioner
Minnesota Pollution Control Agency
520 Lafayette Road North
Saint Paul, Minnesota 55155

Re. Anoka County Comments on the Metropolitan Solid Waste Management Policy Plan 2022- 2042

Dear Commissioner Kessler:

Anoka County appreciates the extension of the public comment period. The county offers the following general and strategy-specific comments on the draft Metropolitan Solid Waste Management Policy Plan 2022 – 2042.

The county respectfully submits the following general comments for the Draft Metropolitan Solid Waste Policy Plan.

- Anoka County requests more specific information on how construction/demolition waste and wood waste would count toward the 75% recycling goal in the statute. More clarification is needed regarding what the expectations are for each county; the material types collected, and how the county is to report on these new initiatives.
- Anoka County requests that enforcement of state statutes for businesses and multi-family properties be included in the Policy Plan.
- Anoka County requests that waste abatement objectives for waste reduction be clarified specifically regarding how waste abatement is to be calculated.
- Anoka County believes that a 5% landfill rate is not realistic. The County encourages the agency to move beyond traditional measurements through management methods that employ broader diversion metrics.

The county also respectfully submits the following comments regarding specific strategies in the Draft Metropolitan Solid Waste Policy Plan.

Required compost use in county projects

The County recommends the MPCA and MN Dot coordinate efforts to update specifications to better delineate SSOM compost from yard waste compost. This strategy would be more appropriate for land use at the city level. Anoka County Public Health and Environmental Services does not have land use authority, it is outside of our jurisdiction. Furthermore, purchasing decisions for SSOM compost are

made at the department level and are decentralized, making the application of this requirement for internal county operations more challenging. We believe this is also the case with city operations.

C&D and wood waste

Regarding Strategy 41, the County does not have the authority to work on live trees. The Policy Plan assigns points to this activity; however, it is outside the jurisdiction of a County Solid Waste Department to conduct operations as noted in Strategy 41. The county requests that required and optional strategies for C&D and wood waste focus on areas where the Twin Cities metro area counties have authority to implement such strategies.

Building Material Management Plan

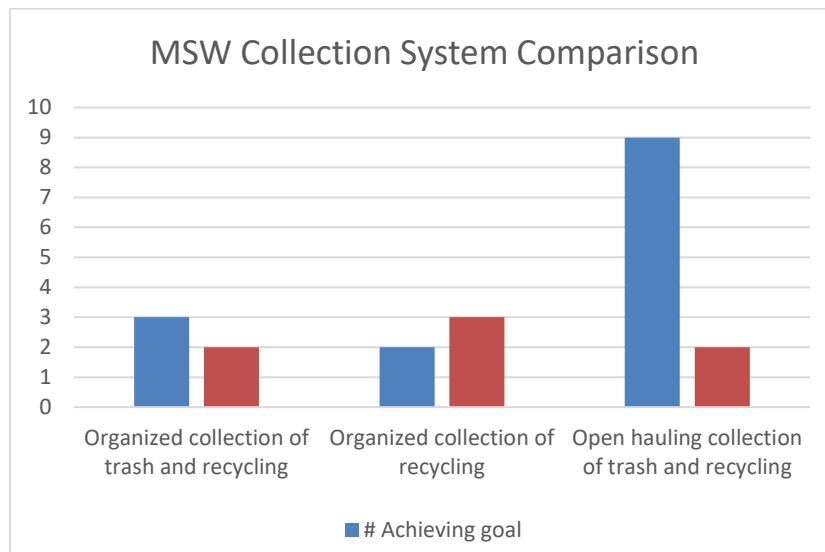
Regarding Strategy 60, changes to this strategy are needed due to the feasibility of implementation at the county level. Anoka County does not have jurisdiction over municipal building codes and requirements, which would need to be modified to achieve this strategy. Anoka County only has jurisdiction over county-owned and operated facilities. Additionally, the Public Health and Environmental Services Department (responsible for carrying out the County Solid Waste Management Plan) does not have control internally over building material management. This is the responsibility of the Anoka County Facilities and Management Department.

Organized collection

Regarding Strategies 31 and 32, Anoka County is opposed to these being classified as required strategies. Anoka County requests that these strategies be classified as optional. Our experience and data contradict the conclusion in Strategy 31 that "...organized recycling collection programs yield a higher recycling rate when compared to non-organized recycling programs...".

The county offers the following information as justification for this request. Note that the word 'communities' below refers to a municipality or township located in Anoka County. There are 20 municipalities and one township in Anoka County.

More than 10 of the communities in Anoka County have some form of organized collection. The chart below notes the number of communities that have organized collection compared to open-hauling collection. Also included in the chart is whether the communities have achieved the county-set, household population-based, goal. In 2022, 14 of the 21 communities met their county-set recycling goal. More than half of these communities (nine) have open hauling.



Data from Anoka County communities show a variety of factors go into whether a community reaches its county-set recycling goal. Communities meeting their goals typically have one or more of the following factors contributing to their success:

- Host monthly recycling day collection events
- Operate a recycling drop-off center that collects a small variety of materials
- Operate a recycling center that collects a large variety of materials
- Employ a highly engaged recycling coordinator
- Experience a high level of public participation at events and recycling centers
- Offer recycling drop-off option 24/7
- Provide clear promotional materials for the program
- Provide coupons or other strategies to reduce disposal costs for residents

Please also note that implementing an organized collection program for waste is a lengthy process and can be especially difficult for staff in small rural communities.

- Staff in smaller communities have multiple responsibilities and thereby have limited time to focus on the recycling program.
- In addition to staffing challenges, there must also be political will and elected officials must be willing to accept criticism for changing the status quo.
- Finally, organized collection of waste may create a business operational inequity situation for small or independent haulers that may struggle to provide this service at the scale needed. There has been significant consolidation of businesses hauling waste since the last planning cycle. Our concern is that requiring organized collection of waste will force smaller and more independent businesses and thereby drive costs up for our communities.

Sincerely,

A handwritten signature in cursive script that reads "Jonelle Hubbard".

Jonelle Hubbard
Director
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