

Aaron Rosenblum

To Whom it May Concern:

As a Minneapolis based family physician, I am concerned about the decision in the current draft of the MPCA's waste management to prioritize and highly value "waste-to-energy," aka incineration.

1. The MPCA fails to account for important environmental justice concepts such as cumulative impact in their assessment that so-called WTE facilities have no legacy impacts and are a better solution for waste processing. These facilities are too often located in already overburdened communities that suffer higher rates of many health conditions. How do you quantify the legacy impact of a child who's parent dies at a young age due to the effects of the poor air quality around them? How do you quantify the legacy impact of the young adult who can't exercise in their neighborhood without the poor air quality causing an asthma exacerbation?

2. Expensive to maintain facilities represent sunk cost that creates financial incentive to not pursue aggressive zero waste policies. Improving landfill safety and pre-destination sorting while continuing to pursue zero waste makes far more sense.

3. Expecting these facilities to continue to operate until some vague time in the future where they are deemed no longer necessary is irresponsible. It asks the poorest in our community to bear the heavy burden of the waste which is generated in far greater quantities by the activities of the wealthy. It does this without giving them any agency in the process, other than as noted with the "concerns of potential impacts expressed by residents near WTE facilities." A shut down date, ideally in the next several years, should be included in this plan.

The technocratic answer may be to maintain WTE. As can often happen with technocratic decision making, it struggles to see what does not fit tidy in its frameworks. Unfortunately, WTE is also the answer that perpetuates environmental racism. So long as the HERC is running, a heavy burden continues to be placed on the people and patients I work with every day. I urge you to reconsider this misguided choice.

Sincerely,
Aaron Rosenblum, MD