

City of Richfield

More focus should be put on multi-unit buildings and commercial generators, targeting efforts to those sectors through required actions (currently strategy 4 is optional). Studying and improving recycling collection at these places is very important as they are currently contaminated generators. Much attention and resources are allocated to single family homes, so it's also an equity issue and an area of opportunity to increase multi-lingual and culturally relevant education and outreach.

Organics management from large commercial generators should be required (currently strategy 39 is optional). High quantities of organics are generated from commercial establishments and there is less outreach and education in this sector compared to residential generators. Additionally, to bring the organics/compost cycle full circle and to ensure that it's a robust and reliable system in the state, there is strong support for strategy 50 (requiring food-derived compost in county construction and landscaping projects). There is also support for sharing education and resources with cities to accomplish the same thing.

End market development is also important for strengthening the value of recycling commodities and ensuring that residents receive the value of continuing to separate recyclables. This can tie into general recycling education around the state of recycling in MN as residents consistently ask city staff "how much of [their] recycling actually gets recycled".

In Richfield and many other cities, residents can have multiple recycling carts at no additional cost. Were increased air emissions included in the environmental analysis to determine if there is significant environmental benefit to mandating weekly recycling? Weekly recycling would double (at least) the cost of recycling for residents, which is not feasible on top of increased costs with trash, organics, and usually yard waste collection as well. While there are a lot of recyclables not sorted correctly, the lack of weekly recycling doesn't seem to impact the diversion rate enough to offset the increased service costs and the impact on the already strained labor.

Actions like sustainable consumption challenges and others that focus on reduction at the start of generation are supported since capacity to process waste is such a limiting factor. Actions that pertain to reduction should be prioritized. Data collection around these actions would also help underline their importance and push for future growth.

There is some concern around pre-processing waste as that could lead to more contamination and less source separation, which would cause increased strain on various resources and labor costs. If the goal is to remove more recyclables from the waste stream, the PCA could consider a cardboard disposal ban to emphasize removal from the trash and proper separation.

Some of the sub-actions are not feasible for implementation at the municipal level. For example, under strategy 38 (Expand backyard composting outreach and resources for residents), bi-annual mailings are listed to encourage backyard composting, but seemingly targeted towards yard waste. There is no mention of food waste/other compostable products, and cities don't have funding available to send out citywide mailings at this rate around one topic. An alternative option could be to include this information in a complete solid waste services guide.

We hope to see the PCA include other organizations in relevant strategies, as demonstrated with the identification of Reuse MN and SWAA in the plan. The Minnesota Composting Council (MNCC) should be involved in composting related initiatives, including strategy 40 and others related to compostable packaging, industry development, education, and more.

Regarding wood waste, municipal staff encourages partnerships between the DNR and the PCA to take advantage of existing DNR programs and resources that are available to cities around forestry management and wood waste. Staff also believe it is too late to focus efforts primarily on EAB tree care and treatment education.

Thank you for this opportunity to comment on the proposed plan.