

September 14, 2023

Minnesota Pollution Control Agency
c/o Peder Sandhei
520 Lafayette Road
Saint Paul, MN 55155

Dear Mr. Sandhei,

Ramsey County appreciates the opportunity to submit comments on the Minnesota Pollution Control Agency's (MPCA) draft of the Metropolitan Solid Waste Management Policy Plan 2022-2042 (Policy Plan). In addition, Ramsey County is a member of the Partnership on Waste and Energy (Partnership) with Hennepin and Washington Counties and is in support of the comments submitted by the Partnership.

Ramsey County welcomes the general direction proposed and values the calls for regional collaboration to tackle emerging issues and highlight best practices. To do this work intentionally and efficiently, Ramsey County has identified themes we believe need to be addressed and built upon in the final Policy Plan. These include environmental justice, race and health equity, and language choice; recommendations for state-led strategies, concerns with the point structure; and opportunities with emerging technologies.

Environmental justice, race and health equity, and language choice

Ramsey County commends the MPCA for the inclusion of environmental justice in solid waste management considerations. It is integral to embed race and health equity and justice in the work we do, while serving our residents. We believe there should be a greater emphasis on environmental justice beyond describing it. The MPCA has an opportunity to apply a racial and health equity lens to the Policy Plan, with a focus on those most impacted by solid waste management. The Policy Plan could also provide specific opportunities and direction from the state on what counties can do to advance environmental justice. In addition, there should be an opportunity for counties that have demonstrated a commitment to environmental justice and race and health equity to receive points toward the minimum 75-point value.

To make the Policy Plan more understandable and accessible to the public, we recommend using best practices as defined by plain language standards. It is difficult to keep track of all the acronyms used. Within the text, consider spelling out terminology, especially if there is an expectation for residents to read this document. In the same vein as the removal of the word "master" from the name of the plan, we recommend removing other harmful language throughout the document. For example, "stakeholder" is an offensive term to some due to its colonial connotations. We recommend using "partner" or "interested parties" as an alternative. Additionally, another word we recommend discontinuing is "citizen." The state and counties provide services to all individuals who reside in this state regardless of their citizenship. Instead, we recommend using the word "resident" when referring to individuals living in Minnesota.

State leadership

Ramsey County urges the MPCA to consider more state-coordinated efforts in several topic areas to accomplish our collective goals. Counties have limited authority in these areas and need state direction and leadership to advance this work.

Reliable and complete data

Having reliable and complete data is imperative for counties to understand the impact of their work. The state should ensure counties receive quality data in a timely manner as counties work on SCORE and annual reporting. We would like the state to seek ways to streamline data gathering for county reporting. Ramsey County is aware that data is missing from the commercial industry and institutions that self-haul, and that our recycling rate is higher than the rate we report annually. Improving the completeness of data that is obtained from cities, haulers, industry, transfer stations/materials recovery facilities (MRFs) and other data sources in the local solid waste system ensures more accurate measurement and performance tracking. Establishing standardized processes for compiling and reporting this data provides a consistent reference for the metro counties' reporting procedures, allowing flexibility for each county to work within their unique solid waste system. At the same time, this would allow for standardized methods and calculating figures from year to year, as well as safeguard from larger issues with data stemming from errors due to late/missing data, a steep learning curve after staff turnover or other changes within counties.

Wood waste

There is currently no state policy or system to manage wood waste. There must be a state-led strategy on this topic, given the regional scope and significant scale of the challenge. A suggestion is that the MPCA lead a coordinated, inclusive planning process focused on wood waste management and prepare a collaborative, statewide emerald ash borer waste management plan, and to do this with counties, cities, agencies and others as active partners and participants. New, innovative technologies and markets can be explored to address wood waste, alongside expansion of familiar ones. The process should identify the development of additional facilities and provide a framework on who will design, build, own and operate them. By identifying the economic elements that need to be in place to make investments viable, particularly for attracting private investment, incentives could be built into this framework.

Saint Paul Cogeneration, a key player in current wood waste management, has stated that they are against having to manage the implementation of a tip fee. In addition, they indicated that, as a utility, they are not well suited to manage the collection of a tip fee at sites across the region that they do not own or control by contract. Accordingly, we are requesting that the state take a leadership role in convening Saint Paul Cogeneration, counties, cities, private site operators and private tree companies to identify mechanisms for addressing the company's revenue needs to allow it to continue to accept and process wood waste, including feasible mechanisms for administering and collecting any wood waste tip fees, should they prove to be necessary to support the facility's operations.

Regional county solid waste management plan cooperation/collaboration

The MPCA should lead in convening meetings with counties as an effort to align and better collaborate on our work together and to promote more regional cohesiveness. Areas particularly in need of coordination include

product stewardship and extended producer responsibility where the state would lead conversations to explore and focus policy and legislative efforts.

Require food-derived compost in county construction and landscaping projects

This is an opportunity for the Minnesota Department of Transportation (MnDOT) to create statewide specifications on food-derived compost. Having a state-created specification would encourage more landscapers and contractors to seek and purchase this material for projects. The MPCA was part of the process for adopting a statewide specification for use of shingle scrap in hot mix asphalt, and the same approach is needed here. County engineers are often reluctant to take on the additional risk and costs by deviating from MnDOT specifications. It would also help counties by providing a template on how to make changes to county ordinances to support using this material in county projects.

Prevention of food waste and increase in food rescue

As the licensing authorities, the Minnesota Departments of Health and Agriculture could lead the efforts working with health inspectors to educate restaurants and other food establishments to increase food donation and reduce waste of prepared foods.

Point value structure and strategy concerns

This iteration of the policy plan introduces required strategies and a point value for optional strategies for counties to implement. We noticed a mismatch where some optional strategies require an extensive amount of effort yet have a low point value. For instance, strategy 39, “Require management of organics from large commercial food generators by 2030,” has a point value of 5. This strategy will call for policy, community engagement and buy-in, financial resources and staffing and should be placed at a higher point value.

As many of the proposed strategies need additional resources, there are challenges counties and municipalities will face since these additional strategies are not accompanied by additional funding and where we may not have staff capacity. It is imperative that the MPCA acknowledge and provide additional resources to counties so that we have adequate resources to conduct this work successfully. Ramsey County will continue to disperse SCORE funding to our municipalities to support solid waste management goals.

Additionally, counties are charged with attaining a 75% recycling rate by 2030. However, most of the strategies do not directly contribute to reaching that goal. There should be more optional strategies that allow counties flexibility in how to approach this work. Further, given that the MPCA has a vision to advance Sustainable Materials Management, which the county supports, and that decisions based on a sustainable materials management approach may work against a goal to maximize recycling material, the county urges the MPCA to clarify how this will be reconciled.

We believe these challenges can be met by allowing more flexibility in strategies proposed, with the additional option to propose alternative strategies to reach 75 points. This would allow counties to implement strategies that yield results favorable in the hierarchy, while within capacity, and tailored to reflect community needs. Ramsey County, while ahead on some of the strategies, will need time to critically consider which strategies to prioritize and apply financial and staff resources.

Emerging technology

New technology plays a critical role in our future. Ramsey County, along with Washington County, continues to explore and invest in new technologies to complement the processing operations at the Ramsey/Washington Recycling & Energy Center. These new technologies extract more value from trash, even as we work to increase recycling and reduce the amount of trash produced in our counties. New technologies can help reduce the amount of carbon and methane gas produced, thereby reducing contributions to climate change.

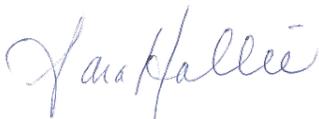
The draft Policy Plan focuses on how emerging technologies fit within the solid waste hierarchy. We recommend that the plan give attention to sustainable materials management principles, highest and best overall use, life cycle analysis and environmental outcomes. Only considering the hierarchy is a linear approach and should not be the most important lens these technologies are evaluated through. Also, there is no recognition of non-mechanical recycling technologies aside from gasification and plastics-to-oil. These are not the only emerging technologies to consider and for which a policy and regulatory framework needs to be determined. The county suggests that sustainable materials management is the primary reference point in analysis, while the waste hierarchy is the secondary reference point, especially if we are to contribute to climate mitigation strategies.

Additional comments found in the Partnership on Waste and Energy letter

Thank you again for the opportunity to provide comments. Please refer to the Partnership on Waste and Energy letter for additional comments supported by Ramsey County on sustainable materials management and extended producer responsibility; measurement and data reliability; education and outreach; collection best practices; market development of food-derived products; wood waste and addressing the impacts of emerald ash borer; solid waste infrastructure and technologies; and sustainable building and deconstruction.

We hope these suggestions will assist the Minnesota Pollution Control Agency in making modifications for the final Policy Plan. Thank you for taking the time to review and consider our comments.

Sincerely,



Sara Hollie, MPH
Director

CC: Trista Martinson, Chair, Board of Commissioners
Ryan T. O'Connor, County Manager
Kathy Hedin, Deputy County Manager
Rae Eden Frank, Interim Division Manager of Environmental Health
Michael Reed, Division Manager, Recycling & Energy
Jennifer Nguyễn Moore, Environmental Health Supervisor