



Planning and Resource Management/Environmental Services

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July 23, 2025

Charles Peterson
Resource Management and Assistance Division
Minnesota Pollution Control Agency
520 Lafayette Road North
Saint Paul, Minnesota 55155

Dear Mr. Peterson

Thank you for the opportunity to review the Dem-Con Landfill SW-290 MSW Allocation/Airspace Conversion Scoping EAW. We have reviewed the documents and have one comment for consideration:

10. Land Use ii Plans.

The EAW describes the MPCA Metropolitan Solid Waste Management Policy Plan 2022-2042 (Metro Policy Plan) and applicability to the project. The main goal of the Solid Waste Plan is to minimize landfilling.

The Scoping EAW doesn't address how permitting additional MSW landfilling is in conflict of the Metro Policy Plan's goal to minimize landfilling.

The EAW does provide background on the need for additional MSW landfilling due to the closure of Great River Energy, Energy Recovery Station. However, it does not provide details on how the MPCA will prevent future facilities from closing, such as the Hennepin Energy Recovery Center, and again needing to permit additional MSW landfilling, thereby, allowing waste to regress back down the hierarchy from waste to energy to landfilling. The Metro Policy plan has a strategy that large facilities must develop closure plans to reduce landfilling, however the Plan doesn't prohibit waste landfilling as an option for disposal.

Please consider incorporating into the Environmental Impact Statement further details on the MPCA plan to reduce MSW landfilling.

Sincerely,

Kate Sedlacek
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