



August 7, 2026

Alison Cameron
Minnesota Pollution Control Agency
520 Lafayette Road North
Saint Paul, MN 55155

RE: County Comments on the Draft Minnesota Resource Management Report

Dear Ms. Cameron:

The Association of Minnesota Counties (AMC), Minnesota Rural Counties (MRC), and the Minnesota Inter-County Association (MICA) appreciate the opportunity to comment on the Minnesota Pollution Control Agency's draft Resource Management Report. AMC represents all 87 Minnesota counties, while MRC and MICA also represent and advocate for counties and county interests across the state. Collectively, our associations bring the perspective of county governments whose elected officials are responsible for public budgets, local planning, land use, public services, and managing the local impacts of state policy. Counties also plan, finance, regulate, contract for, and, in many regions, own or operate parts of Minnesota's integrated solid waste system. Counties support continued efforts to prevent waste, expand reuse, improve recycling and organics recovery, strengthen producer responsibility, and develop reliable markets for recovered materials. Counties have invested in these goals for decades and will remain essential to further progress.

Our organizations and the counties we represent view the draft as a starting point for discussion, not as state policy or a ready-to-implement framework. Its modeled outcome depends on ideal conditions and leaves major questions about feasibility, authority, costs, funding, and regional impacts unanswered. For those reasons, the report should not be used as the basis for legislation, mandates, permitting presumptions, funding priorities, or county-plan requirements. Those decisions require a separate process in which counties have a meaningful role.

A starting point, not state policy

MPCA has told commenters that the Resource Management Report is informational and has no independent legal effect. The final document should carry that explanation in its executive summary and wherever it presents recommendations. This is especially important because the draft pairs a modeled planning benchmark with proposals for enforceable targets, statutory changes, and mandates. Future decision-makers should not mistake an exploratory analysis for an adopted state plan.

A model can illustrate a possible endpoint, but it cannot decide how Minnesota should get there or who should be responsible. Even a corrected model would not answer the policy and implementation questions before the state. Any next phase must identify workable steps, their sequence, who has authority to carry them out, how they will be paid for, and what happens when participation, markets, or infrastructure fall short.

Waste hierarchy and systems counties rely on

The Legislature's direction to measure reductions from landfilling and waste-to-energy (WTE) together was a measurement instruction, not a change to state policy. Minnesota's hierarchy continues to favor prevention, reuse, recycling, composting, and resource recovery before land disposal. The final report should not use the combined measurement to imply that WTE and landfilling now occupy the same place in that hierarchy.

That distinction has practical consequences for counties that depend on regional processing and resource-recovery facilities. Counties support continued movement toward the preferred methods in the hierarchy. At the same time, Minnesota should not give up dependable processing capacity until replacement strategies are operating, funded, and proven at the necessary scale. The report should examine what happens if WTE or other facilities are reduced or closed while diversion programs, markets, or new capacity lag behind the model.

State policy must also recognize existing public and private investments, contracts, facility service areas, remaining useful life, host communities, and contingency capacity. Changes that strand investments or close regional facilities may increase hauling, landfilling, costs, emissions, and burdens on other communities.

The report should explain how its recommendations relate to Minnesota's existing policy framework, including the Metropolitan Solid Waste Management Policy Plan, the 75% metropolitan recycling goal, preprocessing requirements, and approved county solid waste plans. Counties should not receive conflicting direction from the state.

Implementation will differ across Minnesota

Minnesota does not have one uniform waste system. Population density, collection methods, travel distances, available facilities, labor, markets, seasonal populations, and local authority vary greatly across the state. Rural counties may face long transportation distances, smaller volumes, limited staffing, and few practical end markets. Metropolitan counties operate under different statutory requirements and within more complex collection and processing systems. Even a simple Metro and Greater Minnesota split may be too broad.

The report should evaluate existing wastesheds, regional partnerships, facility service areas, hauling patterns, and local conditions. Statewide averages and ideal assumptions cannot show whether a strategy is affordable or workable in a particular region.

The report should also distinguish between outcomes counties can directly influence and those that depend on cities, haulers, generators, producers, private facilities, state permitting, legislation, and end markets. Counties cannot be held responsible for results because they lack the authority or resources to control. Any future expectations must be matched with clear roles, adequate authority, and dependable funding.

Public and private costs

The nearly \$1 billion in capital costs and more than \$315 million in annualized costs identified in the draft are significant, yet they cover only selected processing facilities. They should be presented as a partial estimate rather than the price of achieving the modeled outcome. The public and private commitments needed to change collection, processing, markets, and behavior would be considerably broader.

The estimates do not fully address collection, carts, trucks, transfer, education, technical assistance, enforcement, administration, data systems, contamination management, land, siting, permitting, financing, roads, utilities, contract obligations, stranded investments, decommissioning, or contingency capacity. They also do not explain how costs would be divided among producers, the state, counties, cities, private operators, generators, households, and businesses.

Counties already manage significant state requirements with limited resources. New state expectations should not become unfunded mandates or shift capital, operating, education, enforcement, and reporting costs to local property taxpayers. One-time capital assistance is not a substitute for the stable, ongoing funding needed to operate programs and facilities.

A complete analysis must also consider existing jobs, taxes, fees, public and private investments, household and business costs, and the effects on communities that host facilities. Gross job and economic-output estimates from added recovery activity should not be presented without considering displaced activity, transition costs, and net economic effects. This added data and analysis could better inform efforts to create policy and access to the resources necessary to further Minnesota's waste reduction efforts.

Health and environmental justice conclusions

We support careful evaluation of health and environmental justice impacts. The draft's literature review and identification of potential contaminants can inform that work, but the current comparison is too limited to support a preferred waste-management system.

Counting facilities according to the surrounding community's Social Vulnerability Index does not measure exposure or establish a health effect. Transfer stations, recycling facilities, compost sites, WTE facilities, ash landfills, and municipal solid waste landfills differ in size, inputs, emissions, controls, traffic, operating history, and site conditions. They should not be treated as equivalent units of risk.

The final analysis should use Minnesota-specific information where available and account for facility inputs, emissions, liners, leachate collection, compliance, transportation, distance to people, background pollution, and facility-specific controls. It should also evaluate whether closing or reducing one part of the system shifts burdens to different host communities.

Technical issues that affect the conclusions

Statutory calculation. We are concerned that the headline scenario does not actually reach the measure established by the Legislature. Table 19 shows a decline from 3,368,524 tons managed through landfill or WTE in 2021 to 607,043 tons in the modeled scenario. That equals an 81.98 percent reduction, rather than a reduction of more than 90 percent. MPCA should recalculate the scenario using the Legislature's baseline and threshold, then carry the correction through the report's related estimates and conclusions.

Model and data limitations. The modeled result depends on near-optimal participation and capture, new markets, sustained funding, regulatory changes, new infrastructure, and emerging or unproven technologies. The model also holds 2045 waste generation at the 2021 level. Facility classifications, material flows, regional allocations, and reporting limitations should be corrected and fully disclosed. The final model, assumptions, source data, formulas, and change log should be available for review.

Packaging EPR assumptions. The statement that packaging extended producer responsibility affects 36 percent of the municipal solid waste stream needs clarification. The final report should distinguish the share of the waste stream composed of packaging and paper, the materials subject to producer obligations, and the generators eligible to receive covered services. Minnesota's law does not extend covered services to the entire commercial and industrial sector, and its effects cannot yet be known while implementation is underway.

County experience and areas of agreement

The concerns in this letter do not lessen our support for prevention, reuse, recycling, organics recovery, repair, producer responsibility, market development, better data, permitting reform, technical assistance, and statewide education with local flexibility.

County and regional programs provide tested Minnesota examples for many of the strategies discussed in the report. MPCA should draw more directly from that experience and identify why particular programs work in their local setting. Examples from other states can still be informative, but only when differences in law, financing, geography, collection systems, and markets are made clear.

Providing a service does not guarantee that material will be recovered. Results depend on residents and businesses participating correctly, the service remaining affordable, processors producing usable material, and markets continuing to accept it. Producer action, education, enforcement where appropriate, and ongoing funding are all part of that equation and should be reflected in the final report.

Counties at the center of the next phase

Substantial additional work is needed before Minnesota has a practical pathway for achieving higher diversion while recognizing realistic outcomes, timelines, costs, and available resources. It requires evaluation of regional feasibility, funding, governance and authority, infrastructure capacity, end markets, existing investments, community impacts, and contingency planning when key assumptions do not hold.

Our members are united in the belief that Minnesota needs a clear, statewide vision for solid waste management—one developed collaboratively by state agencies, local government partners, the Legislature, businesses, and other stakeholders. That vision should be grounded in proven best practices, and include a long-term investment strategy that promotes efficiency, builds on existing infrastructure and regional partnerships, and leverages the successful work already underway across the state.

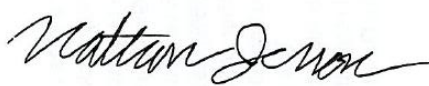
Counties ask to be engaged as full partners in shaping both the vision and the implementation strategy. County commissioners are accountable to residents and ratepayers, while county staff and regional system operators understand the practical realities of collection systems, contracts, facilities, end markets, and state regulatory requirements. Their experience is essential to developing achievable policies and identifying the authority, resources, and partnerships necessary for successful implementation.

We appreciate the opportunity to comment and look forward to working with the MPCA, the Legislature, counties, and other stakeholders to develop a practical, sustainable, and statewide approach to Minnesota's solid waste future.

Sincerely,



Larry Lindor, Pope County Commissioner
President, Association of Minnesota Counties



Nathan Jesson, Executive Director
Minnesota Inter-County Association



Britta Torkelson, Legislative Director
Minnesota Rural Counties