



August 7, 2026

Alison Cameron
Minnesota Pollution Control Agency
520 Lafayette Rd. N.
St. Paul, MN 55155

Dear Ms. Cameron:

Ramsey and Washington counties have worked together to manage waste responsibly since the 1970s. Today, the counties work jointly through Ramsey/Washington Recycling & Energy (R&E), governed by the joint powers R&E Board, which is composed of commissioners from the two counties. R&E serves over 800,000 residents and 28,000 businesses and, through R&E, the counties strive to protect public health and the environment.

The R&E Board appreciates the challenge undertaken by the Minnesota Pollution Control Agency (MPCA) to conduct a study and present a report on getting to a 90% reduction of materials disposed of in landfills or incinerators across Minnesota within the next 20 years. The report represents an opportunity to reimagine Minnesota's solid waste management system and look towards a future that is focused on community and regional collaboration centered around a circular economy. The scope of such an undertaking is daunting, and we recognize the MPCA's efforts to fulfill this ambitious legislative charge.

To contextualize the magnitude of this challenge, Minnesota's current recycling rate is roughly 40–50%, and organics diversion remains comparatively low (below 10% in many communities). Moving from these baseline conditions to a system that achieves a 90% reduction in landfill and waste-to-energy within less than two decades would require not only transformational infrastructure buildout, but also sustained changes in human behavior, public policy, markets and funding over multiple implementation phases.

The cost of this transition is substantial: the report itself points to nearly \$1 billion in capital investment for new facilities, in addition to ongoing program costs that could exceed tens of millions of dollars annually statewide for education, outreach and system support. These investments come at a time when counties and local governments already face constrained resources, limited staffing and competing priorities, raising serious questions about how such a system could be equitably funded and maintained.

Equally important, achieving the participation rates assumed in the model would require widespread and sustained changes in human behavior—across residents, businesses and property owners—without clear evidence of the policy tools, incentives or enforcement mechanisms capable of driving that change. Over 30 years of experience with source-separated recycling shows that public participation is neither automatic nor guaranteed, particularly when costs increase or systems become more complex. Failure to account for these behavioral realities introduces significant risk into the feasibility of achieving 90% diversion.

To ensure this opportunity results in a practical and realistic path forward, we recommend that the report more clearly defines a set of solutions that address system governance, funding and the role of existing infrastructure. Specifically, the report should consider:

- Facilitating organizational structures that enable regional collaboration through the formation of solid waste management districts or similar governance models to coordinate planning, investment and system operations across jurisdictions;
- Identifying sustainable financial strategies, including mechanisms to support public-private partnerships (P3s), to fund the significant capital and ongoing programmatic investments required to transform the system;
- Clearly distinguishing waste-to-energy (WTE) from landfill within the framework, and recognizing WTE as preferred over landfilling, consistent with Minnesota's waste management hierarchy, that can serve as a critical transition tool to reduce landfill reliance while advancing materials up the hierarchy; and
- Providing a more comprehensive assessment of feasibility, including realistic timelines, costs and the behavioral changes required to achieve system-wide transformation.

Strengthening these elements will help align the report's vision with a realistic, implementable strategy that can be advanced by counties, municipalities and partners across the state.

For clarity, we have aligned our comments with the report requirements laid out by the 2023 Minnesota Legislature.

(1) an overview of how municipal solid waste is currently managed, including how much material is generated in the state and is reused, recycled, composted, digested, or disposed of;

The Resource Management Report builds from documentation like county SCORE reports to present a picture of Minnesota's existing municipal solid waste (MSW) management system. The report provides some good insights, such as materials to target for reduction based on waste characterization studies conducted across Minnesota. The potential benefits of this overview are limited, however, due to how data sets are visualized. Data are organized in non-standard ways with redundant categories or missing context that makes it hard to interpret what the figure intends to convey.

Practitioners in the MSW management sector are acutely aware that technical data and complex system dynamics must be translated into clear, accessible information for non-technical audiences through effective storytelling, plain language and clear visualizations to help readers understand how the system works and why it matters. When data are presented in a confusing or overly technical way, readers may disengage, reducing their understanding of and support for waste reduction, recycling and other diversion programs. We recommend the authors revisit how data are organized, prioritizing clear, simple visuals with more context and explanation, including infographics. This overview section should also clearly set the stage for the analysis and recommendations that follow. We suggest authors reengage with solid waste industry experts who work to improve the system every day to glean practical insight into the realities of managing discarded materials in Minnesota.

Additionally, the report relies heavily on terminology shorthand to refer to broad concepts, which results in a lack of clarity and an unfortunate combining of concepts that should be considered

separately. This oversimplification does a disservice to describing both the current waste system in Minnesota and the potential vision for 90% diversion. For example, the report combines WTE and landfill into a “disposal” category, which omits the value WTE currently brings to Minnesota for energy recovery and landfill diversion. Similarly, the report conflates downstream MSW materials recovery with mixed waste processing. While the processes may be similar, the upstream frameworks are distinct and should be noted as such. Downstream materials recovery predicates that residents sort their recyclables upstream, with resource recovery occurring only as a “last chance” tactic. Conversely, mixed waste processing solely uses the downstream recovery process with no source-separation upstream. Overall, R&E recommends that the authors define terms up front with adequate and relevant differentiation of similar terms and processes and then use these terms consistently and with intention.

Missing from this report is alignment with existing reports, upcoming plans and mandates that impact Minnesota’s waste management system. For example, concurrently with the development of this report, the MPCA completed the Critical Materials Recycling and Recovery Task Force report. That report has a series of clearly identified recommendations regarding governance, implementation and measurement that should at least be referenced by this analysis. Additionally, the framework outlined in the Resource Management Report appears not to integrate mandates from the MPCA’s 2022-2042 Metropolitan Solid Waste Management Policy Plan, including requirements for organics recycling and recyclables pre-processing prior to landfill as well as anticipated changes to the waste stream from the implementation of the Packaging Waste and Cost Reduction Act. Any scenario built to move Minnesota towards 90% diversion must consider and include these existing requirements.

(2) a summary of infrastructure, programs, policies, and resources needed to reduce the amount of materials disposed of in landfills or incinerators statewide by more than 90 percent over a 2021 baseline by 2045 or sooner. The summary must include analysis and recommendations of scenarios above Waste-to-Energy on the state's Waste Hierarchy that maximizes the environmental benefits when meeting the 90 percent reduction target;

The report presents the 90% diversion scenario as an attainable model, when, in reality, the inputs that built the model are not currently achievable. The model relies on achieving an idealized 75% curbside recycling target, which is overly optimistic given current rates across Minnesota. The report offers no empirical evidence or behavioral mechanism to explain how the state will achieve these unprecedented participation metrics. Similarly, to reach its targets, the report assumes universal recycling access. However, current data show that only 33% of multi-unit complexes in Minnesota have any recycling infrastructure at all. The report does not account for the massive, unfunded mandates placed onto property owners and/or local governments to bridge that gap.

The report’s target of 55% wasted food recovering is difficult to reconcile with the current reality of Minnesota’s organics infrastructure, particularly outside major metropolitan areas, where there are few commercial composting or anaerobic digestion (AD) facilities and a majority of counties have an organics diversion rate less than 5%. New facility development can take many years due to challenging permitting, regulatory and financing environments. The report should acknowledge these barriers and recommend actions to address them, including streamlining AD permitting, creating infrastructure funding that supports public-private partnerships and prioritizing regional-scale projects. These strategies would help expand processing capacity while also providing opportunities to address pollutants such as PFAS through combined AD and biochar technologies.

Additionally, the report presents an idealized model that underestimates infrastructure and implementation costs. Achieving 90% diversion requires a multi-billion-dollar overhaul of programming, education, collection operations, transfer stations and sorting/processing facilities that will require deliberate, intentional investment to prevent overburdening counties and their communities.

The report does attempt to acknowledge this reality. On page 57, the report alludes to the impracticality of the proposed scenario:

*“Achieving the 90% diversion scenario assumes **near-optimal** participation and capture rates across all programs, increased reliance on MWP, and successful deployment of emerging or **unproven technologies**. Achieving this level would require significant new investments, regulatory development, and market creation, and **may not be realistic without major breakthroughs**.”*

These limitations should be lifted up at the outset to highlight the real limitations to achieving an idealized 90% diversion scenario, particularly in the directed timeframe.

(3) an analysis of: (i) waste prevention program impacts and opportunities; (ii) how much additional capacity is needed after prevention for reuse, recycling, composting, and anaerobic digestion systems to achieve that goal; and (iii) what steps can be taken to implement that additional capacity, including working collaboratively with local governments, industry, and community-based organizations to invest in such facilities and to work together to seek additional state and federal funding assistance;

R&E appreciates the strong focus the report puts on the need for upstream programming, outreach, education and engagement, including calling out programs R&E has led that other counties could replicate. The report’s discussion of needed upstream infrastructure for reuse, repair and rental programs is a critical complement to the need for additional waste processing infrastructure like composting, AD and recycling facilities. On page 62, the report notes, *“Minnesota already has pockets of repair and reuse activity in every county, but these networks require additional support to expand, modernize, and scale their impact.”*

As previously noted, it is critical that the report reflects that this type of programming comes at a significant cost that should be considered as part of the overall analysis. For example, Ramsey and Washington counties invested over \$12.5 million in 2025 on programs targeting food waste prevention, commercial and residential recycling, building materials reuse and similar upstream efforts. Our two counties represent 14% of the state’s population. Using rough math, expanding similar efforts statewide would cost approximately \$89 million each year. Even with these efforts, the three-year average recycling rate of both counties is around 50% according to 2022-2024 SCORE data, well below this report’s 90% goal. We recommend the report describe specific elements such as the market support, incentives and funding mechanisms (e.g., tax incentives, grant programs, etc.), including possible expansions of SCORE funding for counties to support these efforts on a larger scale.

R&E also appreciates that the report recognizes the need for cross-jurisdictional collaboration to achieve these ambitious goals. Counties are responsible for managing solid waste, but they do not do it in a vacuum. The report calls for the creation of over 381 new facilities across Minnesota at a combined initial capital expenditure cost of over \$980 million. Even if counties take on only a portion of this investment, with private industry and nonprofits picking up the rest, the investment is still more than

most counties could manage on their own. Investment of this scale requires regional coordination and management through solid waste management districts, hub-and-spoke models or other methods of collaborative governance. R&E asks that this report further uplift the necessity for multi-jurisdictional and public-private partnerships to achieve ambitious waste reduction and diversion goals. Additionally, we recommend utilizing existing collaborative governance and P3 case studies within Minnesota to analyze an approach to fostering additional partnerships being formed in the state.

(4) strategic programmatic, regulatory, and policy initiatives that will be required to produce source reduction, rethink and redesign products and packaging to more efficiently use resources, and maximize diversion from disposal of materials in a way that prevents pollution and does not discharge to land, water, or air or threaten the environment or human health;

Minnesota cannot continue to create and landfill millions of tons of garbage every year. We appreciate the report's focus on extended producer responsibility efforts, like the Packaging Waste and Cost Reduction Act, to address the upstream producer causes of waste in our system. To achieve a zero-waste future, the continuous creation and consumption of products need to be addressed.

In developing its recommendations for initiatives, the report needs to more thoroughly address potential unintended consequences from increased costs, including increased waste exports out of state and illegal dumping. In setting the 90% waste reduction target based on waste disposed only within Minnesota, there is a risk that waste could simply be transported to neighboring states rather than reduced or better managed. This would shift environmental impacts beyond Minnesota's borders rather than reducing them, while also increasing transportation-related emissions and transferring burdens to rural and lower-income communities outside of the state. Further, if the costs of new recycling and processing systems become too high for residents and businesses, particularly in rural areas, illegal dumping may become more common. This is an unacceptable public health and safety risk that can cause long-term environmental damage through the contamination of soil, water and natural habitats.

To avoid these outcomes, we recommend that waste reduction goals are supported by realistic timelines, adequate in-state infrastructure development and investments that keep participation affordable and accessible for all Minnesotans.

(5) recommendations for reducing the environmental and human health impacts of waste management, especially across environmental justice areas as defined under Minnesota Statutes, section 115A.03, and ensuring that the benefits of these resource management investments, including the creation of well-paying green jobs, flow to disadvantaged communities that are marginalized, underserved, and overburdened by pollution and that land, water, air, and climate impacts are considered; and

To address this requirement, the report goes beyond the legislative charge to model two scenarios, one where the remaining 10% of waste is handled with a combination of WTE and landfill, and a second scenario that eliminates WTE and relies solely on landfills. This choice introduces bias into the analysis and is in direct contradiction to Minnesota state statute, including the waste management hierarchy. R&E recommends the report analyze the impacts of a third scenario, in alignment with established state waste management laws and goals, that relies first on WTE and limits landfilling to only that which cannot be managed in any other way. The report should also do more to emphasize the risks of

increased landfilling it identified in its analysis, including water pollution and climate emissions as noted on page 160.

(6) a review of feasibility, assumptions, costs, and milestones necessary to meet study goals.

While the report outlines an ambitious vision to reduce landfill and WTE disposal by 90%, it does not present a realistic or feasible model for achieving that outcome. The scenario relies on assumptions about participation, infrastructure expansion and system performance that are not supported by current conditions or demonstrated experience in Minnesota. This letter has discussed R&E's concerns and recommended revisions, which are summarized below.

Achieving this goal within two decades would require a generational transformation of the state's solid waste system, including significant infrastructure investment, policy alignment, market development and sustained behavior change. The report identifies the need for more than 381 new facilities and nearly \$1 billion in capital investment, but it does not fully account for ongoing operational, staffing, collection, enforcement and long-term maintenance costs. The proposed approach also places substantial demands on counties and local governments, which already face funding and capacity constraints. While these challenges are acknowledged, the report does not provide a clear strategy for alleviating them or identifying sustainable funding streams.

In addition, the model assumes near-optimal participation in recycling and organics diversion programs despite well-documented challenges related to convenience, cost, contamination and public adoption. Long-term behavior change, program compliance and the risk of unintended consequences are not sufficiently addressed. The scenario also depends in part on "*emerging or unproven technologies*" (page 57) and exceptionally high system performance, introducing significant uncertainty.

R&E remains committed to advancing practical, sustainable solutions that move Minnesota toward its long-term zero-waste goals. We recommend the report be revised to address these concerns, including evidence-based assumptions, an achievable timeline, comprehensive cost analysis, robust funding mechanism and forward-looking governance strategies. The review should be grounded in demonstrated system performance and account for participation, behavior, technology and performance challenges. In approaching feasibility and milestones, we recommend incorporation of pilot projects, measurable milestones and ongoing evaluation to reduce risk and improve implementation success.

(b) The commissioner must obtain input from counties and cities inside and outside the seven-county metropolitan area; reuse, recycling, and composting facilities; anaerobic digestion facilities; waste haulers; environmental organizations; community-based organizations; Tribal representatives; and diverse communities located in environmental justice areas that contain a waste facility.

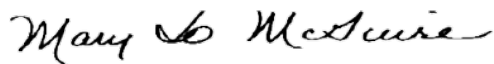
We appreciate the attempts at outreach put forward for this report. Unfortunately, input is not as clearly reflected in the resulting draft as a whole. For example, on page 174, the report notes that "*Local governments consistently underscored the strain of limited capacity and funding, particularly in smaller counties and rural areas, where long hauling distances and low population density make recycling and composting costly. Respondents emphasized that the most useful support for county and municipal recycling operations would be increased and more flexible funding, particularly through expanded SCORE allocations and state grants, noting that financial constraints and limited staffing remain the most*

significant barriers.” The report does not meaningfully address these concerns or outline how they must be met to expand the system effectively. We encourage the authors to revisit local government input and ensure it is integrated throughout the reports’ analysis, findings and recommendations.

As we look at the future of solid waste management in Minnesota, this report presents some useful guidance for areas of needed investment and policy changes to reduce the amount of waste created and processed in Minnesota. R&E staff would be happy to discuss any of the above to provide additional information or input. We look forward to continued engagement with the agency on this important topic.

As a next step, R&E recommends the creation of a task force of key stakeholders, including counties and local governments, solid waste industry experts and environmental advocacy coalitions to work together to discuss concrete actions that can be taken to move Minnesota’s solid waste management system forward.

Sincerely,



Commissioner Mary Jo McGuire, Chair
Ramsey/Washington Recycling & Energy Board
Ramsey County, District 2



Commissioner Fran Miron
Ramsey/Washington Recycling & Energy Board
Washington County, District 1



Commissioner Rafael Ortega
Ramsey/Washington Recycling & Energy Board
Ramsey County, District 5



Commissioner Karla Bigham
Ramsey/Washington Recycling & Energy Board
Washington County, District 4



Commissioner Kelly Miller
Ramsey/Washington Recycling & Energy Board
Ramsey County, District 7