

Blue Earth County (Taylor Piotter)



BLUE EARTH COUNTY

*Effectively and Efficiently
Delivering Essential Services*

www.blueearthcountymn.gov

COMMISSIONERS

District 1 Patty O'Connor
District 2 Vance Stuehrenberg
District 3 Mark Piepho
District 4 Kevin Paap
District 5 Kip Bruender

July 7, 2026

Minnesota Pollution Control Agency

Attn: Alison Cameron

520 Lafayette Rd N

Saint Paul, MN 55155

Comments on the Draft Resource Management Report

Dear Ms. Cameron,

Thank you for the opportunity to review and comment on the draft Minnesota Resource Management Report released for comment May 2026. Property and Environmental Services staff are providing the following comments for your consideration.

PAGE	REPORT STATEMENT	COMMENT/QUESTION
12	“As directed by the Legislature, the Resource Management Report: Describes how MSW is currently being managed across Minnesota. Analyzes prevention, reuse, recycling, composting, and anaerobic digestion (AD), including the capacity needed to achieve these outcomes. Recommends infrastructure, programs, policies, investments, and milestones to support implementation. Incorporates environmental justice considerations by identifying opportunities to reduce disproportionate pollution burdens and improve access to benefits, including the creation of well-paying green jobs, are accessible to	Does this report dictate the path that the state intends to follow to reach its overarching solid waste management goals, or does it represent an option for addressing waste management issues that most closely aligns with state opinion? Is this report AN option, or THE option?

Property & Environmental Resources

410 S 5th St Mankato, MN 56001 ~ PH: 507-304-4251 ~ Fax: 507-278-0021 ~ PO Box 3566 Mankato, MN 56002-3566

Blue Earth County is an affirmative action, equal opportunity employer.



Printed on
Recycled Paper





BLUE EARTH COUNTY

*Effectively and Efficiently
Delivering Essential Services*

www.blueearthcountymn.gov

COMMISSIONERS

District 1 Patty O'Connor
District 2 Vance Stuehrenberg
District 3 Mark Piepho
District 4 Kevin Paap
District 5 Kip Bruender

	historically marginalized communities. This report does not evaluate or make recommendations regarding any single facility. Instead, it examines statewide systems and identifies opportunities for transformation and innovation across Minnesota's waste and materials management system"	
18	"Generation and Disposal Comparison" In 2021, Minnesotans generated approximately 5.86 million tons of MSW (5.63 pounds per person per day), based on county-reported data through Minnesota's statewide SCORE reporting system."	Does this total factor in wastes transported across state boundaries as part of the management chain for a given material? "Generator" does not universally mean "original source"
36	"Mixed Waste Processing... Generally less effective and more costly than source separated collection"	Full dependence on consumer sortation leads to significant contamination issues in source-separated streams. While upstream diversion and source-separation are ideal, they represent long-term solutions that will take significant and systematic changes within the current collection system. Additionally, while mixed waste processing does represent a cost, the resulting opportunity to find alternative disposal options to landfilling through waste processing helps to economically justify the application of additional diversion measures. This is especially true in waste streams that are not historically "clean".
60	"Even so, nearly half of Minnesota's waste is generated outside the TCMA, and achieving statewide diversion targets will require meaningful contributions from every region."	What methods does the state intend to employ to achieve more meaningful contributions from Greater MN? Are targets expected to shift to align with metro abatement percentages? Will there be more non-competitive funding

Property & Environmental Resources

410 S 5th St Mankato, MN 56001 ~ PH: 507-304-4251 ~ Fax: 507-278-0021 ~ PO Box 3566 Mankato, MN 56002-3566

Blue Earth County is an affirmative action, equal opportunity employer.



Printed on
Recycled Paper





BLUE EARTH COUNTY

*Effectively and Efficiently
Delivering Essential Services*

www.blueearthcountymn.gov

COMMISSIONERS

District 1 Patty O'Connor
District 2 Vance Stuehrenberg
District 3 Mark Piepho
District 4 Kevin Paap
District 5 Kip Bruender

		and resources available to achieve the goals outlined in Figure 24 and Table 21 ?
67	“Reaching the high-diversion outcomes modeled in this report will require sustained investment in prevention, reuse, and source-separated collection programs. These investments should focus not only on tonnage but also on equity and access, ensuring that residents, businesses, and institutions across the state have convenient opportunities to participate in waste prevention and diversion.”	Fully agree with this statement. However, it is important to note the differing costs for servicing more geographically distributed populations.
68	Discussing reuse as a primary strategy for waste management: “By investing in both physical infrastructure and enabling policies, Minnesota can build a system where diversion is the default, reuse and recycling are accessible statewide, and disposal is reserved only for what cannot be recovered.”	While this is the ideal system that we can achieve with time, we need to be practical in managing waste through currently achievable methods until the policy and framework for management through reuse (broad adoption, not an instanced application of reuse) can be established.
69	Table 22	The section of the table devoted to our area (SE and SW) details that there are currently 3 MRFs in the area. 6 additional (small, ~20,000 TPY) MRFs would need to be sited to achieve recycling and diversion goals. Current throughput is calculated at 9,300 TPY, with an additional processing requirement of 247,700 TPY to reach the 90% diversion suggested for the southern regions. 1) How does the state propose achieving consistent volume to support these facilities (especially without a lever available to guarantee recyclables to a facility)? 2) Funding

Property & Environmental Resources

410 S 5th St Mankato, MN 56001 ~ PH: 507-304-4251 ~ Fax: 507-278-0021 ~ PO Box 3566 Mankato, MN 56002-3566

Blue Earth County is an affirmative action, equal opportunity employer.





BLUE EARTH COUNTY

*Effectively and Efficiently
Delivering Essential Services*

www.blueearthcountymn.gov

COMMISSIONERS

District 1 Patty O'Connor
District 2 Vance Stuehrenberg
District 3 Mark Piepho
District 4 Kevin Paap
District 5 Kip Bruender

		(Recent build priced at \$52,000,000 for 45,000 sq ft. "Large" facility)
72	"Comprehensive alternative collection systems provide residents with safe, convenient options for materials that cannot be managed through curbside recycling or mixed waste processing. These include household hazardous waste (HHW), electronics, bulky items, construction and demolition debris, scrap metal, textiles, plastic film, and wood waste. Because these items are difficult to recover once they enter the MSW stream, drop-off infrastructure is critical to prevent landfilling or WTE. To evaluate geographic access, the modeling assumes each drop-off site could manage up to 50,000 users annually and that 90 percent of Minnesotans should be within a 15-minute drive. Using these assumptions, the analysis identified a need for 342 additional sites statewide (Table 26)... represents an accessibility benchmark rather than a recommendation to construct 342 additional facilities"	This piece has been discussed for e-waste and battery collection. Despite posing a significant hazard and needing collection, private investment has continued to fight against having a collection role at every turn. How, without significant mandates and a drastic expansion of EPR for all waste types, would the cost of providing this level of accessibility for all waste types not fall entirely on local governance?
97	"drop-off sites remain a core component. When designed comprehensively, they can serve as one-stop community hubs that:..."	Much of the conversation throughout this report encourages the use of a select few waste management facilities which are supplemented by surrounding transfer systems. Is the intent of the state to further encourage and support this hub-and-spoke model as the preferred management method for all waste types (similar to the model prescribed by the agency for C&D wastes as part of the new rulemaking)?

Property & Environmental Resources

410 S 5th St Mankato, MN 56001 ~ PH: 507-304-4251 ~ Fax: 507-278-0021 ~ PO Box 3566 Mankato, MN 56002-3566

Blue Earth County is an affirmative action, equal opportunity employer.





BLUE EARTH COUNTY

*Effectively and Efficiently
Delivering Essential Services*

www.blueearthcountymn.gov

COMMISSIONERS

District 1 **Patty O'Connor**
District 2 **Vance Stuehrenberg**
District 3 **Mark Piepho**
District 4 **Kevin Paap**
District 5 **Kip Bruender**

97	At a minimum, comprehensive drop-offs should accept: wood products: dimensional and engineered wood, pallets and crate wood non-container glass scrap metal: ferrous and non-ferrous plastics: durable and bulky plastics (e.g., crates, totes, buckets, tubs, housewares); plastic film and flexible packaging (e.g., retail bags, shrink agricultural film); special handling containers (e.g., oil, lubricant, and non-curbide plastics (e.g., window blinds, insulating foam, composite and rubber-like materials C&D materials: bricks and concrete, asphalt roofing, gypsum board, ceramics, tiles, toilets, sinks, insulation, tubs, showers, cabinets, fiber other bulky materials: furniture, mattresses, solar panels	The infrastructure necessary to support this level of separability, along with the other points described about collection site's roles will prove substantial. The capacity to consistently acquire freight quantities of each material would continue to prove difficult for many Greater MN programs.
100	"Incorporating recycled content into products requires robust collection and processing networks, and individual producers can rarely affect all aspects of the recycling supply chain through voluntary commitment. Instead, utilization of recycled content should be established through a comprehensive legal framework that drives market development, technology innovation, and continuous improvement. Mandatory standards are needed to establish a consistent baseline across all producers and ensure that progress is not limited to market leaders."	We are supportive of this, provided the ramifications of setting standards are well understood and consumer costs are not significantly impacted.
103	"CII education and enforcement programs: require property owners or managers to provide recycling and organics services, signage, and tenant education;..."	Is the state going to mandate this aspect of collection to help support local policy implementation? Trying to implement a broad CII disposal mandate at the local level with limited support would be tough.
104	"Formula-Based Funding (Stable and Recurring) Minnesota's core funding structure includes formula based allocations that provide predictable annual support to counties: SCORE Grants: established in 1989, allocate state revenues to counties to support recycling programs, household hazardous waste (HHW) management, public education, and waste reduction initiatives; counties	It should come as no surprise that current distributions of SCORE funding throughout Greater MN are consistently too low to cover the cost of extensive recycling programming. How does the state intend to adjust this distribution to help reach the goals highlighted throughout the first portion of this report? If the intent (as later discussed on page 105) is to rely on a mixed funding model, how will local jurisdictions with limited existing infrastructure (and who exist in proximity

Property & Environmental Resources

410 S 5th St Mankato, MN 56001 ~ PH: 507-304-4251 ~ Fax: 507-278-0021 ~ PO Box 3566 Mankato, MN 56002-3566

Blue Earth County is an affirmative action, equal opportunity employer.





BLUE EARTH COUNTY

*Effectively and Efficiently
Delivering Essential Services*

www.blueearthcountymn.gov

COMMISSIONERS

District 1 Patty O'Connor

District 2 Vance Stuehrenberg

District 3 Mark Piepho

District 4 Kevin Paap

District 5 Kip Bruender

	retain flexibility to tailor implementation to local needs Local Recycling Development Grants (LRDG): provide ongoing funding to metropolitan counties within the TCMA to support regional recycling and organics initiatives These formula-based programs form the backbone of Minnesota's diversion infrastructure and provide consistent support for education, operations, and compliance activities."	to outstate disposal resources without these requirements) ensure that additional funding needs are met?
107	<i>"Even with ambitious prevention, reuse, and source-separated recycling programs, it is unlikely that Minnesota could reach 90% diversion without some role for MWP. MWP facilities can recover recyclable materials and organics that are missed upstream, but they do so at higher cost and with lower-value outputs."</i>	Does the state intend to continue supporting the role of mixed waste processing as an interim measure for 1) diversion of current and legacy waste streams and 2) building modular capital that can pivot to support new systems, given the limited practicality of implementing broad systems for reuse and recycling from scratch?

Thank you again for the opportunity to share our feedback. We appreciate your work on this report.

Sincerely,

Taylor Piotter

Taylor Piotter

Blue Earth County Property and Environmental Services

507-304-4106

taylor.piotter@blueearthcountymn.gov

Property & Environmental Resources

410 S 5th St Mankato, MN 56001 ~ PH: 507-304-4251 ~ Fax: 507-278-0021 ~ PO Box 3566 Mankato, MN 56002-3566

Blue Earth County is an affirmative action, equal opportunity employer.



Printed on
Recycled Paper

