



PHYSICAL DEVELOPMENT/ENVIRONMENTAL SERVICES

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July 7, 2026

Minnesota Pollution Control Agency
Attn: Alison Cameron
520 Lafayette Rd N
Saint Paul, MN 55155

RE: 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. In addition to comments provided by the Scott County Board Commissioners, Environmental Services staff are providing these additional following comments for your consideration.

Introduction to Minnesota's Waste Management Hierarchy

Discussion of Minnesota's statutory waste management hierarchy should be much more prominent and covered in the Introduction section (rather than first discussed on page 41) to provide better context for the entire report. This discussion must be expanded to provide a detailed analysis of each management tier or strategy rather than an oversimplified overview that waste management falls neatly into two buckets: (Reduce, Reuse, and Recycle) or (WTE/Landfill). This oversimplification adds confusion to local jurisdictions and industries reviewing this report. Decision-makers require an understanding of the operational complexities within each strategy along the continuum, including the specific trade-offs and differentiation among them. As an example, why are anaerobic digester (AD) systems that recover energy excluded from the "recycling" strategy, while AD with beneficially digestate is included as "recycling" and furthermore implied in the report as the "preferred method of disposal."

Furthermore, the Introduction section should include information on the Metro Policy Plan and County Solid Waste Management Plans (presently on page 90), as these documents outline the statutory obligations binding the State and local counties. Moving this information to the Introduction section properly contextualizes the report, respecting the fact that many stakeholders have already heavily invested in the directives set by the Metro Policy Plan.

Diversion Infrastructure Investments

Infrastructure data and graphs should maintain consistency by clearly distinguishing both existing and proposed facilities. Specifically, Figure 29 (Illustrative Siting of SSO Facilities) needs to be updated to include existing source-separated organics (SSO) facilities. Without differentiating between existing and new infrastructure, Figure 29 implies that a new SSO facility is needed in Scott County. In fact, the Shakopee Mdewakanton Sioux Community's Dakota Prairie composting facility is a large SSO facility located in our county.

Statutory changes, regulations, and enforcement

The report recommends statutory updates (metro and statewide) and revising statutory language to require recycling for commercial, industrial and institutional generators. While the policy intent is supported, the report lacks a fiscal impact analysis regarding labor to administer programs (e.g., FTE hours inspecting hundreds of larger generators or CILs). Furthermore, it fails to identify the responsible regulatory authority for enforcement administration. If enforcement is expected to fall on local government units without additional capacity (such as additional funding and local government support), the projected waste diversion metrics should be downgraded to reflect anticipated non-compliance.

Thank you again for the opportunity to share our feedback. We appreciate your work on this report and look forward to continuing our partnership as it moves toward final adoption.

Sincerely,

A handwritten signature in blue ink that reads "Kate Sedlacek". The signature is fluid and cursive, with the first name "Kate" and last name "Sedlacek" clearly distinguishable.

Kate Sedlacek
Scott County Environmental Services
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