

August 10, 2026

Minnesota Pollution Control Agency

RE: Comments to the Draft Resource Management Report (May 2026)

To whom it may concern,

Thank you for the opportunity to submit comments to the Draft Minnesota Resource Management Report. As a resident, I am grateful the State's elected officials are so interested in reducing our impact on the environment and hope this report is used to justify increased funding to not only meet but exceed the State's diversion goals.

There is a lot of information that I agree with in the report, especially the following acknowledgements:

- meeting a 90% diversion rate will take decades
- it will involve significant investment in increasing access, education, funding, markets, policies, and programs and infrastructure for waste reduction, reuse, recycling traditional and non-traditional items, composting and development and expansion of technologies emerging in Minnesota (e.g. MWP, AD, Biochar)
- meeting a 90% diversion rate is not feasible without public, private investments in addition to active participation, education and outreach to and from neighborhood and community groups and cultural leaders

An overarching item that is not thoroughly detailed in the report is how difficult behavior change can be for individuals and how long it takes for new programs to become the norm. For example, Minneapolis has had a curbside recycling program for over 40 years, however their [2022 Waste Characterization and Capture Rate study](#) of single-family homes found a significant amount of recyclable materials are still put in the trash. This reiterates the need for making diversion programs as easy and convenient as possible and providing frequent ongoing education on programs available. Without convenience and access, we are unlikely to meet these ambitious goals.

I provide the following comments as a resident passionate about waste reduction, reuse, recycling, composting, and outreach and education. To keep my comments as short as possible, please note I also support all comments made by the Minnesota Composting Council (MNCC) on this draft report.

Please do not hesitate to reach out if you have any questions or would like clarification on any of my comments. Thank you again for the opportunity,

Kellie Kish
Minneapolis resident

Wood / dimensional lumber, other recyclable wood, etc.

The purpose of the report is to develop scenarios and recommendations to reduce disposal by of municipal solid waste (MSW) in landfills and waste-to-energy (WTE) facilities by more than 90% compared to a 2021 baseline by 2045 or sooner (P. 12). While I agree that diversion of all usable items is important and preferable to any disposal method, the report is specifically supposed to address reduction of MSW. Construction and demolition debris is explicitly separate from MSW in Minnesota. There are a considerable number of instances where the report includes diversion of or policies for non-MSW items like wood, building materials, etc. as components of meeting 90% diversion.

Additionally, the report uses many different words / terms for ‘construction and demolition debris’ and ‘wood’. While it makes sense for some wood to be included (e.g. wood that’s found in MSW), a broad discussion of C&D, dimensional lumber, treated wood, etc. are not part of MSW and should not be included in the scenarios or recommendations to meet said diversion of MSW. There are other items that may need to be reclassified as C&D as well (e.g. Sliding windows and doors).

There is no definition section to address what is included in the broad categories. The following terms are all used in the report that could all include wood: building materials, dimensional lumber, treated wood, pallets, wood flooring, construction and demolition debris/materials, C&D, architectural salvage and deconstruction, recyclable wood, other recyclable wood, etc. Which of these are ok to classify as MSW and which should solely be classified as C&D?

Here are some examples when wood or C&D debris are referenced where additional clarification is needed or should be explicitly stated why it is or is not MSW.

- P. 14: ‘Wood and textiles make up the next two largest reuse categories’
- P. 15: Figure 1. Reused Materials in Minnesota, 2021: ‘wood’, ‘pallets’; Table 1. Share of reuse activity attributable to residential vs. commercial sources: ‘wood’, ‘pallets’
- P. 16: Figure 2. Recycled materials in Minnesota, 2021: ‘dimensional lumber’, ‘wood flooring’
- P. 28: Figure 11. Top MSW disposal categories from CII: ‘other recyclable wood’
- P. 44: ‘MPCA tracked reuse in categories...’wood’
 - P 45: explicitly calls out ‘deconstruction and building materials’ as a category
 - P. 45 The only local ordinances referenced in ‘Reuse levers used in the model’ relate specifically to building materials (Cook Co., IL and San Jose, CA)
- P. 46: Table 14. Waste prevention and reuse under the 90% diversion model: recyclable wood’, ‘construction and demolition debris’

- P48: ‘2021 SCORE data – painted and treated wood (1%) and dimensional lumber (38%) – assume this data is incomplete (e.g. only some counties reported building materials) and these are clearly C&D items that should not be included in this report diverting 90% of MSW.
- P. 58: What CII diversion looks like in practice: Construction and demolition (C&D) material recovery section
- P. 63: Programmatic Investments. Built environment and C&D reuse section: Entire section refers to C&D material that is not part of MSW.
- P. 67 and 68: Diversion infrastructure investments section frequently discusses construction / deconstruction requirements.
 - P. 67: Physical reuse & redistribution facilities, ‘architectural salvage and deconstruction’
 - P. 67: Institutional & commercial reuse systems (CII), ‘construction deconstruction requirements and salvage coordination’
 - P. 68: Policy, incentives, and performance signals, ‘deconstruction standards’
- P. 72: Alternative collection systems, ‘construction and demolition debris’
- P. 80: Diverted Material Value: ‘lumber, C&D materials’
- P. 81: Table 32. ‘Estimated total scrap value...’ – Other Recyclable Wood and C&D Other Construction and Demolition listed
 - Leaves and grass (why not yard waste / yard trimmings here? – introduced a 3rd term for YW)
- P. 91: Table 37: Estimated tons and share of MSW addressed by policy approach.
 - Universal comprehensive alternative collection systems – tons addressed and notes 21% of total MSW in this category but no details on what this includes
 - P. 96: Alternate Collection Systems for Hard-to-Recover Materials – ‘...dimensional and engineered wood, pallets, painted and treated wood, bulky plastics and C&D materials’ listed – some, if not all of these are not part of MSW, yet Table 37 on P. 91 states this category makes up 21% of MSW.
- P. 97: Report states
 - Strengthen existing markets for ‘dimensional lumber’
 - Develop new markets for ‘treated wood’
 - Comprehensive drop-off sites should accept ‘wood products and C&D’
- P. 98: Other Policy Options includes ‘sustainable built environment practices’
- P. 99: States ‘...C&D diversion requirements may represent one of the most significant opportunities to close the gap toward modeled diversion targets’ and notes policies adopted in other communities.

Incorrect or excluded information

There are several spots in the report where there are inaccuracies in the information provided and where the report excludes pertinent information about local programs (some stemming from State of Minnesota / MPCA requirements themselves) when it includes examples from programs from other states.

Examples where information is inaccurate or other local programs should be described include:

- P. 48: Some examples of bulky item collection are inaccurate
 - [St. Paul, MN](#): 12 items / garbage cart / year; no monthly limit; not included in the 12 items / year: mattresses and bed frames – must be scheduled through 2nd chance recycling
 - Minneapolis, Minnesota: weekly curbside collection of up to two large items with recyclable items collected on recycling week only (e.g., furniture, carpets, appliances, electronics, mattresses, metals); appliances, electronics, mattresses, box springs and metals recycled, with other materials put directly into the back of the garbage truck and sent to a waste-to-energy facility; approximately 26,586 items collected annually, including ~1,734 tons recycled in 2024;"
 - Cite where data came from
- P. 187-188: 'Plastic Bag Reduction Policies in Minnesota Cities'
 - Minneapolis, Edina, St. Paul, Roseville and Duluth have 'carry-out bag' ordinances; not 'single-use' plastic bag ordinances. These cities ordinances, except for Duluth's, also put a fee on paper carry-out bags. Other cities are considering implementing similar ordinances.
 - St. Louis Park does not have a bag ordinance and is noted as having one in the report.
- P. 189: 'Hennepin County Fix-It Clinics'
 - All metro counties have fix-it clinics now and Fix-It activities are happening in Greater MN too.
- P. 190 - 191 – Higher ed. Reuse: No Minnesota reuse programs referenced in the report.
 - Reusable containers: UMN and St. Thomas have reusable to-go container program; not referenced.
 - Campus move-in / move-outs: UMN does this too for on-campus housing and has a year-round reuse room. St. Thomas also has a well-developed reuse program for students.

Other comments

- P. 21: MSW Characterization (and P. 182: Waste Characterization Methodology)
 - MPCA requires facility reporting for all WTE facilities. Why are other states information, and some very old information (2015 IL and 2015 USEPA referenced in Appendix), used to determine the MSW composition in Minnesota? Why was the State's own facility information excluded?
- The lack of color differentiation on some of the charts makes it challenging to tell the difference between some of the blue shades. Examples include:
 - P. 56: Figure 20. Distribution of MSW by management method under baseline and 90% diversion scenario
 - P. 61: Figure 24. MSW management by method under the 90% diversion scenario, by region)
 - P. 85 Figure 31. Proportion of the RR economic output by operational focus (easier to understand as these go left to right but color contrast could still be improved)
- P. 57 '...residuals from MRFs, compost facilities and MPW programs are assumed to be routed to MWP facilities.'
 - It is assumed that the cost to send residuals to a MWP would cost more than directly to a disposal facility. The report does not address this or how policy may be required to have residuals from MRFs and compost facilities routed to a MWP.
- P. 68 – Two paragraphs say almost the same thing. Suggest combining them into one paragraph: 'By strengthening...market conditions'...and 'By investing in...enabling policies'
 - There is no discussion in this section that convenience and continued education is needed for people to participate in said programs to truly make diversion the 'default'. P. 57 states '90% diversion assumes near optimal participation and capture rate' – in reality that's not going to happen even if infrastructure, markets and policies are in place without awareness and convenience.
- P. 73: Alternate collection systems
 - 'mobile and seasonal collections' – should note need for more and/or more frequent seasonal collections are needed in high-density areas w/ limited access to transportation
 - 'retailer and recycler partnerships' – should add neighborhood and community organizations as partners. Businesses / government programs will not be enough to address necessary convenience standards, especially

in dense urban areas (report note that 45% of drop-off material need to be captured in order to meet the 90% diversion rate [end of P. 73]).

- P. 86: Figure 33. Direct output of the RRR industries compared to other leading industries in Minnesota
 - Suggest spelling out RRR in the table. It looks odd abbreviated with the other industries spelled out.
- P. 93: Policy impacts 6% of the MSW generation stream.
 - First sentence in the first paragraph is essentially the same as the first sentence in the last paragraph of the section on P. 94.
- P.103: Local Policy Considerations: ‘adequate/equal space ordinance’ This recommendation should be updated to amend the state building code. It isn’t feasible as written; cities can’t be more strict than state building code requirements.
- P. 104: Funding considerations - references funding options as ‘foundation for local programs’, but does not mention lack of increased funding in SCORE or other stable and ongoing funds to support increased materials / programs (waste reduction, reuse, organics, built environment, etc.)
- P. 175 last sentence of first paragraph and first sentence of P. 176 say the same thing but list different cities.
- P. 195: ‘Mixed Waste Processing’ – Section only discusses R&E’s Newport facility. It does not reference any MWP facilities in Greater MN.
- P. 197: ‘Biochar’ – Section states the Minnesota will need to establish a formal definition, testing standards, and material quality benchmarks, but nowhere does it mention the need for citing and design requirements. Same is true for AD facilities (no citing and design requirements).
- P. 252: Figure 76: Reported barriers to increasing recycling rates – More than ½ of the items in the chart are missing descriptions. Same with Figure 82: Barriers to increasing recycling rates in recycling facility respondents’ service area on P. 260.