July 2, 2026

Minnesota Pollution Control Agency
Attention: Alison Cameron
520 Lafayette Road North
St. Paul, MN 55155

RE: City of Red Wing Comments on Resource Management Plan

Dear Ms. Cameron:

The City of Red Wing appreciates the opportunity to comment on the Draft Resource Management Report issued for public comment by the MPCA and provide the following comments for consideration.

Minnesota's Longstanding Waste Management Framework

The City of Red Wing supports the goals of Minnesota's Waste Management Act, including waste reduction, reuse, recycling, composting, material recovery, and resource recovery to reduce land disposal. These goals are not new to Minnesota communities, nor are they new to Red Wing. They have served as the foundation of Minnesota's waste management policy for more than forty years and have guided the development of local and regional integrated waste management systems throughout the state.

Minnesota's Legislature established a clear policy direction through Chapter 115A by prioritizing waste reduction, recycling, composting, and resource recovery ahead of land disposal. Equally important, the Legislature recognized that protecting Minnesota's air, land, and water resources would require coordinated planning, significant public investment, regional cooperation, and the deliberate development of integrated waste management systems. Chapter 400 similarly recognizes that protecting Minnesota's natural resources is best accomplished through organized and coordinated waste management programs.

Red Wing's Experience Implementing the Waste Hierarchy

Communities like Red Wing responded by making decades-long investments in integrated waste management systems designed to implement Minnesota's waste hierarchy.

The system that exists today is not the product of a few years of effort. It represents decades of planning, public engagement, infrastructure investment, legal challenges, political support, operational experience, and continuous improvement. Red Wing has invested in curbside recycling collection, commercial recycling services, drop-off recycling, electronics recycling, appliance recovery, tire recycling, concrete recovery, cardboard recovery, single-sort recycling, yard waste and brush management, wood waste

processing, waste processing, metal recovery, public education, and the ongoing evaluation of additional recovery opportunities, including organics management.

In many ways, the system operating today reflects the very policies and priorities this report advocates.

The Challenge of Achieving the Next Increment of Recovery

The City's experience has been that meaningful progress is achievable, but each successive increment of recovery becomes increasingly difficult, expensive, and dependent upon factors outside the direct control of local governments. After decades of implementing Minnesota's waste hierarchy, communities like Red Wing often find themselves investing significant time, effort, and resources in pursuit of the next one or two percent of recovery.

This reality should not be mistaken for a lack of ambition. Communities like Red Wing continue to pursue additional recovery opportunities, but local governments ultimately manage the waste stream that arrives at their facilities rather than control the products, packaging, and markets that create it. We do not control product design, packaging decisions, material composition, consumer purchasing behavior, or the availability of end markets.

As a result, many of the largest future gains may increasingly depend upon actions occurring upstream of the waste management system. Product redesign, waste reduction, reuse systems, producer responsibility, packaging changes, and market development may ultimately have a greater influence on future diversion performance than additional investments in collection and processing infrastructure alone.

Managing Today's Waste While Building Tomorrow's System

Even if upstream changes are aggressively pursued, they will take years—and in many cases decades—to fully develop and mature. Communities and operators must continue managing the waste stream that exists today while simultaneously planning for the waste stream of tomorrow.

This raises a practical question that every waste management system must answer:

What should be done with the residual materials that cannot presently be prevented, reused, recycled, or composted, and for which practical recovery solutions may remain theoretical, economically infeasible, or operationally unattainable for years or even decades?

Minnesota's waste hierarchy has historically answered that question by recognizing resource recovery as the preferred management option for residual waste prior to land disposal. This policy did not emerge accidentally. Communities invested accordingly.

Resource Recovery's Role in Minnesota's Integrated System

As a result, communities like Red Wing have achieved landfill diversion rates exceeding 90 percent through a combination of recycling, composting, material recovery, and resource recovery. This

represents substantial progress toward the objectives established in Minnesota's Waste Management Act and Minnesota's long-standing landfill abatement goals. It is the direct result of implementing the waste hierarchy as it has existed for more than four decades.

The question is not whether additional gains are possible, but whether the remaining gains can realistically be achieved through downstream recovery efforts alone.

Resource recovery reduces the quantity of material requiring land disposal while recovering energy from residual materials that cannot reasonably be managed higher in the waste hierarchy. Landfills, by contrast, are long-term containment systems designed to store waste and manage its impacts over time rather than eliminate it.

Modern landfills are highly engineered facilities and serve an important role in Minnesota's waste management system. However, they remain long-term containment systems. Post-closure care requirements and financial assurance mechanisms establish regulatory periods of responsibility, but the waste itself remains indefinitely. Methane generation begins shortly after waste placement, declines over time, but may continue for many decades while engineered systems age and future generations ultimately inherit responsibility for managing the residual risks associated with landfilled materials.

In practical terms, land disposal stores residual waste for future generations to manage, whereas resource recovery reduces the volume of material requiring disposal while recovering value from residual waste.

For many Minnesota communities, resource recovery was adopted not as an alternative to recycling and composting, but as a means of reducing dependence on long-term land disposal while recovering value from materials that could not otherwise be practically recovered.

The Difference Between Theoretical and Demonstrated Recovery

This perspective is important when evaluating ambitious diversion goals. The report appropriately identifies materials that are theoretically recoverable, but there is a meaningful distinction between theoretical recovery potential and demonstrated recovery performance under real-world economic, behavioral, and operational conditions. Communities must contend with contamination, fluctuating commodity markets, transportation costs, labor constraints, participation rates, and the practical limitations of available technology.

None of these observations should be interpreted as opposition to innovation, higher diversion goals, or continued efforts to move materials higher up the waste hierarchy. Most waste professionals, myself included, would welcome a future where less waste is generated, more materials are reused, more products are recyclable, and fewer disposal facilities are needed. We are not defending the status quo; we are describing the reality encountered after decades of pursuing continuous improvement.

Recognizing Progress While Planning for the Future

The question is not whether additional progress is possible, but whether the report adequately recognizes the substantial progress already achieved through four decades of implementing Minnesota's waste

hierarchy while fully acknowledging the increasing economic, operational, behavioral, and market challenges associated with achieving the next five, ten, or fifteen percent of diversion.

From the perspective of a community that has spent decades building and operating the type of integrated waste management system envisioned by state policy, the report sometimes reads as though Minnesota's current integrated waste management system represents the starting point for improvement rather than the product of more than forty years of deliberate implementation of Minnesota's waste hierarchy. That distinction matters because the path from zero to forty percent diversion is fundamentally different from the path from forty percent to ninety percent.

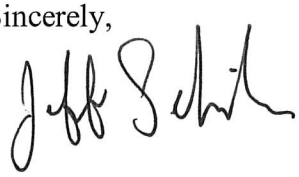
Recognizing that diversion rates approaching 90 percent present significant practical, economic, and operational challenges does not weaken Minnesota's environmental goals. It strengthens them by grounding future policy decisions in the experience of the communities that have spent decades implementing those goals.

Preserving the Intent of Minnesota's Waste Hierarchy

Finally, it is important that efforts to increase diversion not inadvertently obscure the role Minnesota's waste hierarchy assigns to the management of residual waste. For more than forty years, state policy has recognized resource recovery as preferable to land disposal for materials that remain after higher-order management practices have been applied. This distinction reflects not only diversion goals, but also recognition of the long-term environmental stewardship responsibilities associated with land disposal. Communities throughout Minnesota invested in infrastructure and programs based upon that policy direction.

Any future reconsideration of Minnesota's integrated waste management policy should recognize and preserve the relationship between waste reduction, recycling, organics recovery, resource recovery, and land disposal established by the Legislature. Any change to state policy should be built upon demonstrated operational experience and supported by comprehensive lifecycle analysis, economic evaluation, technical feasibility, and demonstrated success—not solely by modeled diversion scenarios or theoretical assumptions that have yet to be proven under real-world operating conditions.

Sincerely,



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