

Hennepin County Draft Solid Waste Management Plan

Verbatim written comments submitted during the public comment period

September 6, 2024

I agree with proposed plans.
I agree with ban of single use bags.

Great plan overall.
ADD: Plastic bag ban for all retailers throughout the county (or add it as a required strategy under "Strategies to Implement with cities".
YES to required strategies #30 & 40: We lived in Mpls and used the organics recycling and are now glad to see it in Plymouth, although we are some of the only neighbors who use it. It's a 'must' that all types of pickup happen on the same day. We'd prefer to have city-run solid waste/garbage hauling in Plymouth, too, but that is not the case. Numerous solid waste trucks drive through the neighborhood each Friday, adding to wear and tear and pollution. Add an incentive for cities to go to single hauler?
Strategy #26 ia good but #27 could be fraught with issues. Who defines what is 'reusable'? The curbside could become littered with junk. How would this work? In cities other than Mpls (where just about everything is picked up by garbage haulers), residents may use it as a way to get rid of stuff without having to pay anything.

I am a supporter of the trash burner downtown. I hate to see it decommissioned.

HERC is environmentally preferable to landfills
HERC is better for the environment than landfills for the following reasons.

Better air pollution controls and fewer air emissions
HERC has an air pollution control system to capture pollutants. This equipment is monitored 24/7.
Waste delivered to HERC is being processed close to where it is produced, minimizing the transportation of waste and associated truck emissions.
Pollution control measures at landfills are buried, meaning it can take years to detect and find a leak in a liner.
Waste in landfills continues to decompose, producing methane and organic compounds. This makes landfills an environmental and health risk for decades.
More energy generated
A ton of waste processed at HERC creates electricity to run a house for 21 days, plus

steam to heat Target Field and downtown Minneapolis.

A ton of waste buried in a landfill creates electricity to run a house for 3 days.

Fewer greenhouse gas emissions

Every ton of trash burned at HERC produces fewer tons of greenhouse gas emissions than if it were disposed of in a landfill because decomposing garbage in landfills produces methane. Methane is over 20 times more potent of a greenhouse gas than carbon dioxide over 100 years.

More metal recycled

More than 11,000 tons of scrap metal is recovered from the waste stream delivered to HERC and recycled annually.

Metals are not recovered from the waste at landfills.

More jobs created

It takes 45 high-wage jobs to operate HERC.

It takes 18 lower-wage jobs to operate a landfill.

'- I imagine we could set a grant aside for haulers to have more ecofriendly trucking options. I imagine most commercial hauling is run by diesel.

- Better advertising in regards to drop off areas, locations, times, etc. We had a drop-off zone set up for paint/cleaning products/batteries. It was incredibly helpful.

There has to be a hit to the pocket to get people committed to zero waste. Especially businesses. The building I work in (Edina) has a restaurant on the lower level and there are organics bins in the loading dock. I never see anything in those bins other than what I toss. Landlord needs to educate (maybe put in their lease?) to use the organics recycling, Businesses need to be penalized for not recycling. No idea how to do that other than spot checks. :) The business I work for has recycling bins and people treat those bins like regular trash bins. Tax breaks for recycling for businesses and individuals but how would you know people were actually doing it? One idea for our airport: Vancouver airport doesn't have trash cans in their food courts. They have a table in the middle where you leave everything and the folks that sit at the table sort the trash for you. Your pdf is excellent and I'm always encouraged to see the high percentage of people who say they want to do something but I'm cynical enough to doubt the follow thru. The survey I took on the previous page said people have the hardest time recycling batteries. Seriously? That's easy. How come no one picked plastic film or multi-layer plastic? Or large plastic items? People don't see THOSE as the big issues? I do agree with the results stated that it's hard to find what to do with some recyclable items. I used to take flour scent bulbs to a hardware store to recycle. No idea where to take it now. I had a trunk full of memory foam for a while trying to find someplace to recycle Ended up tossing it in the trash. Keep in mind lower-income folks have a harder time getting to drop in recycling centers. I've been using a service called Ridwell for a lot of my recycling. You might look into them and consider a partnership where you pay half the cost of the month service for anyone who signs up. Best of luck with what seems like an impossible problem.

I look forward to when all fuel sources for HERC have been diverted and other combustion energy generation is gone from Hennepin county, but until then hope the county keeps the HERC operating as the less negative option for refuse and energy.

#26 - like the idea of reuse of household items, already do this informally. I wish the dropoff facilities would let others collect items that are good or fixable but they wont let you take anything

#31- disagree strongly. recycling collection needs to be weekly. our bin is overflowing after 2 weeks and if you miss one you're in trouble. if you're short on drivers or worried about road damage, maybe instead take a hard look about why the heck it "makes sense" to have 6 different trash hauler companies driving a truck through our neighborhood every week. Divide up the county and give small haulers their own small section/city.

#36- love the idea of sorting trash for recyclables but understand difficulty

#69 love this idea- need more deconstruction/reuse. such a waste everywhere.

Currently we live on Lake Cahloun Pkwy and Lake Street, out building is classified as a business therefore we cannot use the organic pick up. Please make all buildings available for this service. Also why isn't single use plastic taxed at a higher rate? They have no incentive to change.

This is one fish that got away, that a policy for management of dead fish from residential shore lands on lakes experiencing winter or summer fish kills. It would be beneficial for homeowners to have an option to dispose of dead fish washing up on their property. There might be community-wide fish cleanup efforts that need a location to take dead fish for composting. I suggest the County develop a policy for providing residents assistance on such efforts. I recommend the County develop a framework that provides residents and communities a place to dispose of fish voluntarily collected on shores and lake surfaces.

This is a fairly comprehensive plan that is well presented. I would like more information regarding the trash that is not able to be recycled or repurposed. I want the incinerator use to continue as this is a great way to get rid of debris, rather than use a landfill.

I want to support your goals in Strategies 33 & 34 to move to more organized waste hauling. We live in Maple Grove and I believe everyone one of the 8 authorized haulers in our community sends a truck down my street on garbage day. The impact of increased pollution, waste of fuel, long-term damage to our streets and noise irritation make this a ridiculous way to manage garbage pick up. Of course, you also have to add the impact of the recycling truck that comes bi-weekly and the several organic-only trucks that also come every week (for haulers that don't pick up organics and regular garbage with the same truck). I understand that smaller haulers are concerned that they will be forced out of the market, but I would hope the county could work to manage that. I would expect that haulers will find routes more profitable when they don't need to waste driver's time and fuels driving past houses that aren't their customers. Unfortunately, I expect I might end up paying more for my service if haulers no longer have to compete for my business, but perhaps you could give 2 haulers the rights to a route, not just one. I also want to encourage Hennepin County to greatly improve your communications around organic recycling. The mandatory roll out of it our community was terrible - no info from the city or the county and our hauler was unhelpful and confused about it themselves. I also saw the confusion that was expressed on social media sites, like a Maple Grove community Facebook site. People didn't understand how it worked, didn't realize they needed to call to get a bin, didn't understand they were paying, even if they didn't use. They also didn't have an understanding of the long-term benefit it would have. I still see evidence of the lack of understanding every week, when they are only a couple of organics bins put to the curb in our whole neighborhood. After a somewhat shaky start, we have become avid users of our organics bin (although our hauler is a little iffy on remembering to pick it up) and have seen a significant decrease in the amount of regular garbage we have. One other note: The bin our hauler gave us says in large letters "No Bags" on the top - but when we talked with them we confirmed that it simply meant no traditional garbage bags; compostable bags were OK. I would find the process much less convenient without the small compostable bags I put in my countertop bin. There's a lot of education still needed on the organics process. I do want to note that I saw the opportunity to comment in the StarTribune - which your follow up questions didn't think to include. It didn't even have an "other" as an option, where I could have indicated that the newspaper was my info source.

Recycling: Ban plastic bags for EVERYONE, ALL LOCATIONS that now use them. Couldn't get it done last legislative session because the petroleum industry is against it. Guarantee "recycled" plastic is recycled- actually made into something/reused. I've seen enough stories of our waste being sent to countries-all kinds of plastic being burned/floating in the ocean, risking the health and safety of others and the environment. If not, start limiting what should be put in plastic containers. Do we really need endless versions of food, personal care, etc. products? As in different sizes, flavors, scents etc.This could also apply to electronics and clothes. Nobody should be risking their health mining metal from mountains of electronics, burning material sent from the US. Recycling plastic is a joke which makes me question the whole idea. Also, Hennepin Co. sold compost bins and I have been using the one I have for many years. It makes me angry to be forced to pay for compost recycling I don't need. I basically agree with what

you're doing but it seems the cost, the burden, the GUILT is being put on residents instead of designers, manufacturers, retailers(grocers-esp.) and food service of all types. When it comes to making any change, industry will probably win again.

I would like to see the county update its composting regulations. In Minneapolis, there is a fee for the compost container. Get rid of that fee and give people who compost a reduction on their bills - make it worth it for people to compost and recycle. Money talks. Include a coupon so that people receive a reduction in the cost of compost bags; I think they are too expensive and I have an average income. Remember "ban the can"??? Have a deposit on plastic, glass and aluminum cans. That will make a major difference in all the trash I see. Get serious and don't roll over to the beverage industry.

I like the plan! It seems like the county has been listening to residents very closely. It will be difficult to attain our goals but I appreciate the multi-pronged approach and idea of banding together to get it done.

I did not read the entire plan, but I do not recall seeing anything in it about organics recycling in large multi-family buildings. I live in an apartment community with about 300 units, it would be great if we had an onsite recycling program. My son was at the Consumer Electronics Show in Las Vegas last winter and he sent me a picture of a food composting system made by a company called REENCLE. Hennepin County should do some pilot projects with this - the apartment community could keep and use its own compost!

My Maple Grove Garbage hauler will only accept organics in a 35-gallon receptacle which they provide. I make meals every day for 2 people from scratch and have organic waste, but it would never come to more than a gallon of waste to be composted in any week. There must be a way for a 2-person household to have organics composted without another huge container to lug out to the street weekly.

"Mandates" are unacceptable. People are not going to comply with "bans" and "mandates". Also, tossing "equity" into the garbage plan is absolutely ridiculous.

The plan looks like a very thorough and ambitious approach to a very serious, growing issue. Although I am far from an expert on waste management, I am aware of many of the long term consequences we will face if we don't take steps like those detailed in the plan. I commend those working hard to put this plan in place and I would be interested in helping out however I can. I'm also very optimistic about addressing the issue of demolition waste and implementing strategies to recycle more demolition byproducts.

A great source of waste at schools is in the cafeteria. Due to budget cuts, the lunch staff can't always wash the reusable lunch trays. Therefore, they give students styrofoam lunch trays. These get thrown directly into the trash. Buying huge amounts of styrofoam trays may be cheaper than paying someone to wash trays. The county should make sure that every school cafeteria is adequately staffed to make sure such waste doesn't occur. Also, if you talk to the custodians at schools, they'll tell you that sorting cafeteria waste into trash, recycling and compost is a joke. First of all, the cafeteria doesn't give students any items that can be recycled: no aluminum cans, no plastic bottles. Second, the compost bin is always contaminated with trash, so custodians always throw that in the trash. Putting up these separation bins is green-washing. Simple solution, fund the lunch staff so they can use the reusable lunch trays. That will keep a huge amount of styrofoam (plastic) trash out of landfills.

I definitely am in favor of option 27, especially if establishing a citywide garage sale is adopted. I've been to other areas that have them and they seem popular. However, I would wonder what mechanism would be in place to have remaining items collected and reused/recycled.

I also would be interested in learning about easy ways for renters like myself to compost. I don't have anywhere I can collect organics and find it difficult to develop a way to successfully compost. But I also would like to know that if I'm not using my compost, could it be collected and distributed for areas that can use it.

I still would like additional outreach and information about recycling/donation/pickup of large items. I can't seem to easily find where I can take large items for possible reuse and apparently my local recycling center doesn't accept them so it gets frustrating as a renter to know what I can do.

An idea to reduce and eliminate food waste could be to incentivize more local businesses to participate in programs like Too Good To Go, to sell items they are going to throw away. I have participated in this program but find it disappointing that there aren't more local businesses that participate and find that I have to drive pretty far to find participating businesses.

I reading through the WMP I noticed a lot of ideas and plans already implemented around concerns I have but as a newer member to the community and newer resident to Minnesota, I find and have found it very difficult to find information about things like community composting, large item recycling, etc. The website is not as user friendly or informative. Or maybe I'm not looking at the right resources but for me finding the proper information pointing me to what I need is lacking.

Regarding Strategy #36- I wanted to second the concerns expressed about confusion as a customer. I have the concern that if too much resources are dedicated to recovering recyclable materials as a customer it will lead to me feeling like there isn't a difference between using the trash, recycling, and compost. I also have concerns that it will shift time and energy away from reducing waste production and increasing producer

responsibility for packaging.

Regarding Strategy #41-I hope that these programs continue. As a gardener, I have been curious about composting and programs promoting it seem like a great use of resources.

- Policy Plan Strategy #21: Please clarify if this strategy is only required of Hennepin County or will be required of Hennepin County cities as well.
- Policy Plan Strategy #23: Please confirm that this is an opt-in strategy, not requirement, for cities. If Hennepin County considers it to be a requirement, it should be implemented at the County-wide level.
- Policy Plan Strategy #25: Please consider adding additional permanent, regular Fix It Clinic sites to other library branches to better serve the entirety of Hennepin County Residents.
- Policy Plan Strategy #27: Provide flexibility for cities to implement this reuse strategy in a manner that compliments existing bulky-item recycling events.
- Policy Plan Strategies #33 & 34: Please confirm that this is an opt-in strategy, not requirement, for cities. If Hennepin County considers it to be a requirement, it should be implemented at the County-wide level.
- Policy Plan Strategy #55: Provide specifications for food-derived compost to cities so they can incorporate it into bidding documents.

I really do not want my waste going to the landfill. I prefer it to be incinerated because a lot of my waste consists of personal documents.

I appreciate all the work done on this plan.

I am a volunteer board member for Keys4/4Kids, a non profit. We are located n New Brighton in Ramsey County very near the Hennepin County line. We take in donated pianos , refurbish them and sell them. This funds our community programming. Each year we have approx 600-700 pianos we can't repair. We take them to a transfer station in Hennepin County, 400,000 lbs. We would like to put less waste into landfill. Does the plan address a situation like this? We would love to talk with someone in your office about this. Thank you, Todd Marshall 651-247-3594. toddmarshall33@msn.com.

As per, Related Zero Waste Plan actions: A.10, there should be no conditions required to close the HERC. We will get to zero waste by closing the HERC by 2025. We will always rely on the HERC as long as it exists. Speaking of, the Zero Waste Plan should include that Hennepin County will shut down the HERC by 2025.

I am glad our solid waste problem is being comprehensively addressed.

I'm so glad these problems are being tackled. I like many of the strategies that have already been implemented or that are being proposed. Additionally, maybe under Strategy #16, I would like food service places like fast food and restaurants to be mandated to ONLY provide straws, plastic eating utensils and condiment packets upon request. Our refrigerator has an overabundance of soy sauce packets from Chinese take-out plus we have more plastic eating utensils and plastic straws stuffed in a drawer than we can use in our lifetimes, and this is despite my saying when I order that we don't want them. Also, in restaurants, servers bring water with a straw already in the glass. Arrgh! I don't want a straw! In the area of Wood Waste and Emerald Ash Borer, maybe Strategy #45, we also struggle with what to do with the contaminated yard and garden waste from our yard. We have a long row of lilac bushes with the fungus or blight right now and the leaves have dropped. We are told to rake up the leaves and dispose of them but not in our compost. Where? Same with the garlic mustard in our yard and buckthorn. It's a constant battle to keep them under control. I don't want to put this waste in our compost or in the curbside yard waste only to spread the noxious seeds far and wide. I was told by a Master Gardener to put this type of waste in the trash. I am, because it's going to the burner and will be burned up, but it's organic matter so I doubt that's right, either. Small problems in the face of the larger problems, I guess. I think, though, that many people want to do better in every area and would do better, if educated and given the opportunity. Thank you.

In the organics sections, I believe there should be clarity on 1) if multi-family homes are considered commercial generators and if Ordinance 13 applies to them 2) if not, are MFH considered residential and is curbside required 3) can haulers charge MFH for organics like they do recycling under the same state statues

The HERC trash burner should be closed by 2025 with no more conditions attached to for the County to approve it. Zero waste goals and waste management reform will never be achieved as long as the burner is operational. By state law, it has to be utilized as long as it's open. Close the burner, then implement waste management reform to divert trash from burning or burying.

Do not impose any more conditions on closure of the HERC. Closing the incinerator is the single biggest step the County needs to take towards a zero waste economy. The incinerator is like a set of blinders that prevents us from seeing the waste we produce, and the communities impacted with long-term health problems are those least visible to decision-makers.

35 Minneapolis public schools are within a five mile radius of the HERC. Our kids deserve to breathe clean air. The HERC needs to be closed as soon as possible.

Although the plan is a good beginning I would like to go a step further. I would like to compost my own organics but I am in my middle 70's and I am confused on how to start and what composting bins to purchase....I need an online class. Wouldn't it be wonderful if we could purchase these bins at a low price, compost ourselves and eliminate the need for trucks.

RE:#40. Make residential curbside organics collection available in cities with a population greater than 5,000 by 2030

Availability of curbside organics does not help when it is unaffordable. I live in Champlin - curbside organics recycling is \$60 per month. Not a typo -it is \$60 a month ! Resident's participation is non-existent.

Could the plan include an option for organics drop off to provide an alternative solution where negotiated prices are not reasonable. Perhaps require 1 collection point for every x number of residents?

Overall, a good plan. Missing however is the cost disincentive to recycling household furnishings, building materials and electronics. Few are going to pay a fee when they can just throw them in the trash for nothing. Retailers should be required to take them back for recycling or responsible disposal.

Please accelerate closing of the HERC incinerator.

The plan must be revised to include implementation for the closure of the HERC. The County Board Action (BAR 23-0384) passed in October 2023 to create a plan for HERC to close between 2028-2040, which falls within the timespan of this solid waste plan. This plan must include actual planning for HERC's closure if it is to not contradict the county board action.

Hello, I feel that this draft plan does not adequately plan for HERC's closure within the time period of this plan, 2022-2042. It is therefore fundamentally deficient. The "Reinventing Hennepin County's Solid Waste System" report is inadequate as a HERC closure plan since it includes no timeline for HERC's closure.

This draft plan does not even mention the County Board Action (BAR 23-0384) passed in October 2023 to create a plan for HERC to close between 2028-2040, which falls within the timespan of this solid waste plan (2022-2042). This plan must include actual planning for HERC's closure if it is to not contradict the county board action.

This draft plan has reverted back to "first we must get to zero waste before closing HERC." This is illogical. We cannot get to zero waste with a giant incinerator in our waste management system. "Reinventing" the solid waste system requires closing HERC as soon as possible. The county continues to waste many millions of dollars, time, and political will on defending HERC instead of genuinely working to reduce waste.

While this draft plan talks about needing to get to zero waste first, it does not do enough to even meet the state-mandated 75% recycling rate by 2030.

I am writing to let you know that while I appreciate the fact that the County has a goal of achieving zero waste and appreciate all the work that went into this plan, I wholeheartedly disagree with the notion of getting to zero waste first before shutting down the HERC. That would take years and that would mean years of asthma, chronic lung diseases, death for the children, families and the elderly who live within the range of the HERC emissions. I have read the People's Plan that Zero Waste USA has put together and believe that is the way to go.

Thank you for inviting public comment on the 2024 Hennepin County Solid Waste Management Plan. The most glaring omission from this plan is that it does not identify a specific date for the closure of HERC. Anything short of a specific date for closure is unacceptable. ANY solid waste management plan needs a timeline for HERC's closure and a detailed plan to get there on time. It is preposterous that this has not already been included and reflects what appears to be a disingenuous statement of intent to close HERC.

Furthermore, the County Board Action (BAR 23-0384) passed in October 2023. It requires the creation of a plan for HERC to close between 2028-2040, and while the draft plan that I reviewed does in fact cover these dates, somehow an actionable plan to close HERC within the mandated time frame is conspicuously absent from the plan. If that remains absent from the proposed plan, then it will be in willful violation of BAR 23-0384.

Lastly, BAR 23-0384 does not include a requirement or mandate to meet dependencies before closing HERC. The time to do this is NOW. There is a super-tired argument that we need to meet zero waste before closing HERC. This weirdly overlooks the fact that HERC itself is an impediment to reaching zero waste; we cannot be zero waste AND burn trash, that's not what zero waste is. We need to CLOSE HERC NOW. Also weird is that this draft plan talks about needing to get to zero waste before closing HERC, and yet it does not do enough to even meet the state-mandated 75% recycling rate by 2030. So the document is internally contradictory to my mind and needs to be amended to include the action plan to get to shut-down of the HERC by a specific target date.

This plan must include HERC's closure! We cannot get to zero waste in Hennepin County without first shutting down HERC.

Overall, the plan looks good. It is hard to change the behavior of individual residents. Keep working on diverting organic wastes from trash to composting (or anaerobic digestion). Construction waste continues to be a challenge, so I applaud the plan efforts to recover some of that. For discarded usable items, perhaps establish a partnership with charitable organizations to better connect donors with organizations able to accept and use such items (e.g. furniture, appliances, etc.). We will need to continue to have stronger producer responsibility laws to reduce the amount of single use plastic waste.

This plan must include HERC's closure! The only way to get to greatly reduce waste is to shut down HERC. Better yet: Repurpose the HERC into a Recovery Center! The garbage trucks would still collect the garbage. They would still tip the garbage at the HERC. But the burner wouldn't be there anymore - instead, it would be a Recovery Center! More jobs would be created because the garbage has to be sorted. According to recent research analyzing the garbage of about 100? families in Minneapolis: About 1/3 of house waste would need to be sent to a landfill, barring a better alternative. The other 2/3 is either compost or is recyclable!

Key points:

- This draft plan does not adequately plan for HERC's closure or Repurpose within the time period of this plan, 2022-2042. It is therefore fundamentally deficient. The "Reinventing Hennepin County's Solid Waste System" report is inadequate as a HERC closure plan since it includes no timeline for HERC's closure.
- This draft plan does not even mention the County Board Action (BAR 23-0384) passed in October 2023 to create a plan for HERC to close between 2028-2040, which falls within the timespan of this solid waste plan (2022-2042). This plan must include actual planning for HERC's closure if it is to not contradict the county board action.
- This draft plan has reverted back to "first we must get to zero waste before closing HERC." This is illogical. We cannot get to zero waste with a giant incinerator in our waste management system. "Reinventing" the solid waste system requires closing HERC as soon as possible. The county continues to waste many millions of dollars, time, and political will on defending HERC instead of genuinely working to reduce waste.
- The county resolution BAR 23-0384 did not include needing to meet dependencies before closing HERC. Dependencies like "a recycling rate of at least 85%" and "at or near 100% renewable energy" in the state (as recently presented to Minneapolis city councilors) are unrealistic. Dependencies like these are proof that the county is only pretending to respond to public outcry and the board resolution to close HERC -- while business-as-usual continues. Such token efforts are patronizing, misleading, and hypocritical. Especially while the county continues to propagandize HERC and minimize or hide its impacts and risks in tours, presentations, and written materials.
- While this draft plan talks about needing to get to zero waste first, it does not do enough to even meet the state-mandated 75% recycling rate by 2030.

The biggest failing of the County Plan is that they refuse to recognize the clear and present, and constant, danger posed by the incinerator.

This is awful! When the HERC burns garbage in downtown Minneapolis - Lead, mercury, cadmium, and dioxin pours into the air and into peoples' lungs, falling on arable land where food and milk are exposed to these harmful elements. This document doesn't acknowledge the science of burning garbage.

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Hi Henneppin County, thanks for doing this!

#12 I think we need the HERC until we have decreased our trash production. It's just too much to landfill. I wish more people in Hennepin County knew where there trash went.

#26 I would really like there to be more reuse drop off locations. I live near Williston and Woodhaven in Minnetonka which is used as an unofficial drop off site to the frustratin of the neighborhood.

#27 A curbside set out day is a great idea. It should be annually in the spring and part of a city or county wide garage sale. The county should not be responsible for cleaning up what is not taken.

#27 I wish there were more opportunities to recycle batteries. We're now told to put our AA type batteries in the trash but that just feels wrong.

This is not at all "Reinventing" the Solid Waste Plan, it's a commitment to move as slowly as ever and keep the HERC open as long as possible. The plan does not even mention a time that the HERC might close, which would be critical to assess the sort of pace of waste reduction that is being put forward.

Many of the strategies are insufficient (public-private partnership hand waving) or voluntary on the part of businesses.

This plan must include HERC's closure! The only way to get to greatly reduce waste is to shut down HERC. There should be no delay.

This plan does not do enough to get us to the state-mandated 75% recycling rate by 2030. The major action that is missing from this plan is to SHUT DOWN the HERC. You must know by now that experts agree that you need to shut down the garbage incinerator in order to get to zero waste, NOT the other way around. This draft plan does not even mention the County Board Action (BAR 23-0384) passed in October 2023 to create a plan for HERC to close between 2028-2040, which falls within the timespan of this solid waste plan (2022-2042). Without a concrete plan to shut down the HERC you are failing the people of Hennepin county, and continuing down a path that refuses to acknowledge the clear and present dangers of environmental degradation.

Thank you for creating this plan.

I think the very top priority needs to be reduction. Reduction of plastic, reduction of food waste and reduction of burning. Single-use plastics continues to be an enormous problem. Counties should take strong leadership roles in reducing plastic bottles and other single-use plastic in county offices and county events. The public needs to see it can be done!

Recycling of plastic is a problem. Plastic contains so many harmful chemicals, and the toxics are magnified when plastic is recycled, and, also, so much plastic doesn't get recycled at all.

We need a stronger infrastructure to build a reuse economy for take-out and refill in retail and grocery stores. Kowalskis has told me they would do more refill with some financial support.

Burning is not a solution to our waste problems. Burning of waste and organics creates more air pollution which we don't need with our smokey skies and climate crisis. Why send more toxics out into the environment when we are all hoping for a clean air day?

I worked on the public committee that created this plan, and I appreciate Hennepin County's effort.

Please focus the county's resources on reducing and reusing over recycling and burning. Thank you.

This plan MUST include closing the HERC as soon as possible. We cannot get to zero waste while a trash incinerator continues to de-incentivize reducing waste, and uses up precious dollars to run and maintain that could be used for waste-reduction efforts instead.

I really appreciate the County is updating the Zero Waste Plan. Thank you. I live in Bloomington MN, and am greatly concerned about waste, do all I can to eliminate and reduce my own, but am appalled upon learning that what I do create that must be thrown is burned and sent to other people's lungs.

I appreciate that the county further prioritized the highest impact zero-waste actions in the Plan to Reinvent Hennepin County's Solid Waste System to accelerate the closure and repurposing of the Hennepin Energy Recovery Center (HERC). I strongly believe that closing the HERC as early as possible (2028) must be the top priority for Hennepin County. I commend and greatly appreciate that the County is updating the Zero Waste Plan and highly support most of the action items outlined. For a few added comments please see below.

Today with the problem of burning garbage at the HERC we have lead, mercury, cadmium, and dioxin pouring into the air and into peoples' lungs, and falling on arable land where food is exposed to these harmful elements. Children's schools and playgrounds! Hennepin County must no longer refuse to acknowledge the science of burning garbage. This must be #1 priority.

The "Reinventing Hennepin County's Solid Waste System" report is inadequate as a HERC closure plan since it includes no timeline for HERC's closure.

There must be NO MORE conditions put on closing the HERC. I have heard that in many other cities across the country closing their incinerator increased the likelihood of reaching 75, 85, 90% of waste stream reduction. It is this that LEADS the rest of the actions needed to achieve the County's vision. I see the County continuing to waste many millions of dollars, time, and political will on defending HERC instead of genuinely working to reduce waste.

Policy Zero Waste Actions:

Prioritize extended producer responsibility for packaging :

This action should be a number one priority. It is time the "producer" of packaging takes full responsibility for what their packaging is made from and how much packaging they put on products. No "greenwashing" or false solutions should be allowed. For instance – no plastic packaging that is labeled "recyclable" while there is no realistic way to actually recycle the stuff – either no market or no way that a second use of the material is possible, that it would hold up. (And no toxic processing – all of our solutions moving forward must be clean for human health and the environment, not create a new toxic cloud of a problem! Such as CHEMICAL processing of plastic.)

Ban recyclable and organic materials from landfills : (and incineration)

This action MUST create a ban – but the ban MUST include incineration, not just landfills. Programs are needed to phase out organic food waste from landfills and incinerators while investing in programs that reduce food waste, educate and assist consumers, address food insecurity, and cultivate food waste recycling infrastructure like composting.

Reduce Single-Use Plastics & Packaging :

Single-use plastics must be eliminated, not just reduced – all food use items and utensils should be compostable plastics if they cannot be eliminated.

Thank you for this opportunity to comment, and for taking my comments seriously,
Lois Norrgard

This plan fails to include a timeline for HERC's closure within the time period of this plan, 2022-2042. This draft plan fails to mention the County Board Action (BAR 23-0384) passed in October 2023 to create a plan for HERC to close between 2028-2040, which falls within the timespan of this solid waste plan (2022-2042). BAR 23-0384 did not include needing to meet certain recycling or renewable energy rates before closing HERC. This plan must include detailed planning for HERC's closure if it is to not contradict the county board action.

This plan must include a plan to shut down or repurpose the HERC because Hennepin County cannot achieve its zero-waste goals while still burning trash. Money that could be spent on recycling and composting infrastructure is wasted on keeping the HERC running. In addition, the HERC is causing high asthma rates among residents that live near it which this plan does not address.

This plan says nothing about the public health and environmental cost of operating an incinerator. There's no sense of urgency in shutting down the HERC--in fact there's no reason to even think burning waste is a problem, based upon the data provided. Strangely, the plan mentions disproportionate impact of landfilling to marginalized communities, but not incineration.

I agree that a multi-level governmental approach is needed to reach zero waste, but this plan seems to be more an exercise in kicking the can down the road than approaching the problem from the perspective of what the County is able to contribute. As a community, we must understand the costs of the current situation before we can intelligently determine how to move forward. Perhaps it is better to shut down the HERC as soon as possible, even with a brief increase in landfilling in order to work towards reducing waste.

This draft plan does not adequately plan for HERC's closure within the time period of this plan, 2022-2042. It is therefore fundamentally deficient. The "Reinventing Hennepin County's Solid Waste System" report is inadequate as a HERC closure plan since it includes no timeline for HERC's closure.

This draft plan does not even mention the County Board Action (BAR 23-0384) passed in October 2023 to create a plan for HERC to close between 2028-2040, which falls within the timespan of this solid waste plan (2022-2042). This plan must include actual planning for HERC's closure if it is to not contradict the county board action. This draft plan has reverted back to "first we must get to zero waste before closing HERC." This is illogical. We cannot get to zero waste with a giant incinerator in our waste management system. "Reinventing" the solid waste system requires closing HERC as soon as possible. The county continues to waste many millions of dollars, time, and political will on defending HERC instead of genuinely working to reduce waste.

The county resolution BAR 23-0384 did not include needing to meet dependencies before closing HERC. Dependencies like "a recycling rate of at least 85%" and "at or near 100% renewable energy" in the state (as recently presented to Minneapolis city councilors) are unrealistic. Dependencies like these are proof that the county is only pretending to respond to public outcry and the board resolution to close HERC -- while business-as-usual continues. Such token efforts are patronizing, misleading, and hypocritical. Especially while the county continues to propagandize HERC and minimize or hide its impacts and risks in tours, presentations, and written materials. While this draft plan talks about needing to get to zero waste first, it does not do enough to even meet the state-mandated 75% recycling rate by 2030.

Please get serious about your constituents' health and start to move with urgency. HERC must be shut down first in order to enable moving towards zero waste. Please budget for restitution for the harm caused by HERC and take the lead of frontline communities affected by HERC. Please initiate a shut down NOW. Where there's a will to figure out complex issues, there is always a way.

Furthermore, This draft plan does not adequately plan for HERC's closure within the time period of this plan, 2022-2042. It is therefore fundamentally deficient. The "Reinventing Hennepin County's Solid Waste System" report is inadequate as a HERC closure plan since it includes no timeline for HERC's closure.

This draft plan does not even mention the County Board Action (BAR 23-0384) passed in October 2023 to create a plan for HERC to close between 2028-2040, which falls within the timespan of this solid waste plan (2022-2042). This plan must include actual planning for HERC's closure if it is to not contradict the county board action.

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While this draft plan talks about needing to get to zero waste first, it does not do enough to even meet the state-mandated 75% recycling rate by 2030.

This plan still does not recognize the clear and consistent danger of continuing to burn trash. Minneapolis residents, specifically low-income residents and children who play at the playgrounds and attend the schools near the HERC, are being asked to continue to bear the health risks of burning the county's trash. My child's high school is less than 1 mile away. Their middle school athletics field and outdoor picnic tables are just 1.5 miles away. Businesses and surrounding cities need to do their part, and right now, this plan continues to allow the HERC to be a crutch, preventing us from making meaningful Zero Waste progress. A recent Minneapolis trash composition study showed that almost 2/3 of residential trash is compostable or recyclable. The HERC site would better serve our community as a Recovery Center, creating far more jobs and materials recovery than burning trash does.

Other key points about the 2024 Hennepin County Solid Waste Management Plan that need to be addressed:

- This draft plan does not adequately plan for HERC's closure or Repurpose within the time period of this plan, 2022-2042. The "Reinventing Hennepin County's Solid Waste System" report is inadequate as a HERC closure plan since it includes no timeline for HERC's closure.
- This draft plan does not even mention the County Board Action (BAR 23-0384) passed in October 2023 to create a plan for HERC to close between 2028-2040, which falls within the timespan of this solid waste plan (2022-2042). This plan must include actual planning for HERC's closure if it is to not contradict the county board action.
- This draft plan has reverted to "first we must get to zero waste before closing HERC." This is illogical. We cannot get to zero waste with a giant incinerator in our waste management system. "Reinventing" the solid waste system requires closing HERC as soon as possible. The county continues wasting millions of dollars, time, and political will on defending HERC instead of genuinely working to reduce waste.
- The county resolution BAR 23-0384 did not include needing to meet dependencies before closing HERC. Dependencies like "a recycling rate of at least 85%" and "at or near 100% renewable energy" in the state (as recently presented to Minneapolis City Council) are unrealistic. Dependencies like these are proof that the county is only pretending to respond to public outcry and the board resolution to close HERC -- while business-as-usual continues. Such token efforts are patronizing, misleading, and hypocritical. Especially while the county continues propagandizing HERC and minimizing or hiding its impacts and risks in tours, presentations, and written materials.
- While this draft plan talks about getting to zero waste first, it does not do enough to meet the state-mandated 75% recycling rate by 2030.

The goal of implementing a zero waste society might begin with the outlawing of things which cannot be recycled. Black plastic is a prime example! Going forward, let's make sure that every school teacher is taught the practice of recycling, such that every school child is taught! Then, on the assumption that the sum of trash will be greatly diminished, let us set a date for the shutdown of the HERC.

Please prioritize waste reduction, organics and real closed-loop recycling and work towards a ban on more plastics and other products that can only be burned land filled or "down-cycled." Make sure the plan lines up with the commitment from the county to close the downtown garbage burner (aka HERC) and make sure the plan notes that the burner is not a preferred option over land filling. It is time to end the misguided idea that burning waste to produce steam is healthy or acceptable.

It is time to move to zero waste and the county can make a biud start by supporting the full organization of waste hauling in the county, amending its ordinance to require all jurisdictions to make sure any trash service includes organics collection from all residential and commercial and industrial customers and maintains clear records or where collection comes from and where it goes and what it contains.

The goals of reducing waste that cannot be close-loop recycled (back into what it was) or composted need to be increased with funding support.

Construction waste need to be included in reduction goals and much more of that materials need to be recovered for reuse,

We need to ban single-use use noncompostable materials in restaurants, grocery stores, delivery and packaging.

This plan needs to include the closure of HERC! The only way to greatly reduce waste must be a multi-faceted plan that starts with shutting down HERC as soon as possible!

Any solid waste management plan that does not include a plan with clarity and urgency to close the HERC is a disservice to our community. The current proposed plan has no specified date for closure. This draft plan does not even mention the County Board Action (BAR 23-0384) passed in October 2023 to create a plan for HERC to close between 2028-2040, which falls within the timespan of this solid waste plan (2022-2042).

This plan continues to lean on overburdened communities to bear the brunt of our wasteful culture due to harmful health effects of waste incineration. It creates the wrong incentive for the county to continue to reduce waste generation as the HERC relies on an adequate supply of waste to operate at its maximum efficiency. It is magical thinking to think that a zero waste future must and will precede the end of waste incineration in our county. Many communities around the world have eliminated or never started the harmful practice of waste incineration and if anything this is supportive of their efforts

towards zero waste.

I am concerned that the county in drafting this plan is intentionally engaging in obfuscation and obstruction amidst a strong push from affected communities to eliminate this burden on our collective health.

There is no plan for closing the HERC garbage burner. This is unacceptable! For the health and welfare of the City and County, we need to do this as soon as possible, and it makes no sense to draft a plan that does not discuss how to achieve this important goal!

Re: Hennepin County 2024 Solid Waste Management Plan DRAFT

Dear Hennepin County Commissioners,

We appreciate the opportunity to submit comments on the Draft Hennepin County 2024 Solid Waste Management Plan. Communities across Hennepin County have been leaders in zero waste strategies. Adopting and strengthening these strategies across the County and developing policies that support structural change will help us reduce waste and build healthier communities.

Eureka Recycling is a non-profit, social enterprise, recycler in Minneapolis. Our team sorts 100,000 tons of residential recyclables each year into 15 different commodities that support our local supply chain. About 80% of our feedstock is turned into new products here in Minnesota and 90% in the greater Midwest. We work to demonstrate that recycling can and should be done in ways that benefit our environment, communities, and the regional economy.

As a zero waste organization with boots on the ground, we also understand that recycling alone cannot address our growing waste crisis. We need a commitment to effective waste reduction strategies including scaling reuse systems, investing in community composting, ensuring equitable access to programs, and redesigning materials and systems to be managed at the top of the waste hierarchy.

While the draft plan meets the required strategies of the MPCA, these strategies are not enough to address the growing waste crisis laid out in the report and related agency reports. The county should go further with several strategies to significantly reduce waste.

We recommend the following changes to the report:

SCORE Funding: With the passage of the Packaging Waste & Cost Reduction Act this past legislative session, a significant percentage of recycling costs held by the county

will be covered by the new Producer Responsibility Organization. Despite this new program, we agree that policy is needed to ensure a larger percentage of state revenue from the Solid Waste Management Tax is used towards SCORE in order to fully fund zero waste strategies. However, the priority for allocation of SCORE dollars should go to funding and scaling strategies at the top of the waste hierarchy - reduction, equitable and scaled reuse and refill systems, and community-based composting - that have not historically been well funded by SCORE and are not covered sufficiently or at all under the new Packaging Reduction law. We are concerned that the county would prioritize state bonding funding for recycling recovery facilities over proven zero waste strategies that we are seeing scaled in communities across the globe. Capture of metals at landfills and incinerators should be required, but mixed-waste processing is a poor strategy for other recyclables and does not result in materials that are the high quality needed to build circular supply chains (see also strategy #36).

Food Waste Diversion & Reduction: While we appreciate the County's acknowledgement that Recycling Ordinance 13 needs revisions and improved enforcement, the County should be a leading advocate for state policy change that prevents food waste from being landfilled or incinerated. The bedrock policy that catalyzes food recovery and is most effective at preventing organic waste from landfill or incineration is a mandatory organic waste ban. Policy is needed to phase out organic food waste from landfills and incinerators while investing in programs that reduce food waste, educate and assist consumers, address food insecurity, and cultivate food waste recycling infrastructure like composting. (Strategies 40-42)

Single-Use Plastics & Packaging: In addition to supporting local ordinances and state legislation that reduces or eliminates single-use plastic, Hennepin County should be leading by example. It is not enough to simply "explore adopting a countywide policy on reusables at county events." Hennepin County should be a leading example of waste reduction strategies. Public events and public spaces should be zero waste and zero waste requirements should be embedded in government contracts. Additionally, the Biden Administration announced a new goal to phase out federal procurement of single-use plastics from food service operations, events, and packaging by 2027, and from all federal operations by 2035. If this is something the federal government can act on, Hennepin County should be well on its way to eliminating single-use materials at its events and embedded in its contracts. (Strategies 19,22, 23)

Waste Data: We agree that increased data is needed to better understand both the waste crisis and our progress towards reduction. We disagree with strategy #3 - while Hennepin County does not operate a landfill, we do need waste composition studies at transfer stations. This data is important to better understand capture rates.

Education and Outreach: We agree that there should be standardized education for the types of material collected and methods of collection. However, education messaging needs to meet community needs and cultural differences. We hope to see improvements

in education that meet the unique needs of community members. (Strategy 10)

Reuse: The County should be going further to scale reuse across communities. Strategy #22 simply encourages the use of reusable food and beverage service ware. The county should be working to advance an ordinance and/or state legislation that phases in requirements for reusable serviceware. This should go hand-in-hand with scaling strategy #30 - grants for waste reduction, reuse, and repair. If we are going to support equitable access to reuse and refill programs, we need better funding mechanisms that go beyond comparatively small grants, including low-interest loans for innovative, sustainable, reuse startups and businesses.

Collection Best Practices: Hennepin County needs to look carefully at cost effective collections methods. The reason for not implementing weekly recycling and organics collecting (strategy #31) could be mitigated by moving to biweekly trash collection (strategy #32). Additionally, with the implementation of the new Packaging law, there is a potential need for weekly recycling. Hennepin County should have a plan if and/when that need arises.

We look forward to continuing to partner with Hennepin County to advance program and policy solutions to waste issues. We are happy to provide additional information on any of these recommendations and appreciate your consideration of our comments.

Sincerely,

Lucy Mullany
Director of Policy & Advocacy
Eureka Recycling
lucym@eurekarecycling.org
www.eurekarecycling.org

This does not include a timely closure of the HERC. There is no plan here! Without a plan we will not reduce waste significantly. As a teacher and resident of northeast Minneapolis, we no longer want to breath in toxic fumes. We have had enough. You need to go back to the drawing board!

This Draft Hennepin County Solid Waste Management Plan does not detail what steps need to be taken and when to close the HERC within the time period of this plan, 2022-2042. It should not only detail the steps, but recommend budget amounts needed to pursue those steps, and a timeline for how and when those steps can each be completed.

This draft plan does not mention the County Board Action (BAR 23-0384) passed in

October 2023 to create a plan for HERC to close between 2028-2040, which falls within the timespan of this solid waste plan (2022-2042). This plan must include actual planning for HERC's closure to follow the direction of the County Board Action (BAR 23-0384) .

This Draft Plan has reverted back to "first we must get to zero waste before closing HERC" that was in the County Zero Waste Plan that was adopted before the County Board Action (BAR 23-0384). The county continues to waste many millions of dollars, time, and political will on defending HERC instead of genuinely working to reduce waste.

The County Board Action (BAR 23-0384) did not include needing to meet dependencies before closing HERC. Adding requirements in this Solid Waste Management Plan like "a recycling rate of at least 85%" and "at or near 100% renewable energy" in the state (as recently presented to Minneapolis city councilors) are not in keeping with the intent of County Board Action (BAR 23-0384).

While this draft plan talks about needing to get to Zero Waste first, it does not recommend specific actions and budget amounts needed to even meet the state-mandated 75% recycling rate by 2030.

Increase compliance with hauler reporting – required strategy #1

Golden Valley staff are supportive of this. We need to have accurate and complete data to see trends and guide decision-making. Hauler requirements should be enforced.

Provide required county reporting – required strategy #2

Golden Valley staff are supportive of this but believe more can be done. Cities should receive annual tonnage data so they are aware of what the waste stream and diversion rates look like in their community, which would guide decision-making and waste reduction strategies.

Adopt an ordinance with a mandatory consumer charge or ban for single-use items – optional strategy #23

Golden Valley staff are generally supportive of this strategy. Researching and exploring this strategy is included in the Environmental Commission's workplan. Implementing and funding it is another step that would need to be approved by City Council. We would likely need additional staffing and resources and guidance and support from the County. A county-wide charge or ban would be preferred.

Establish a reuse location for residential drop-off and pick-up – optional strategy #26

Golden Valley staff are supportive of this strategy. We hope that the county could lead this effort and set up the drop sites, possibly adding reuse capacity to the existing county drop-off sites for recycling. We have concerns about space, staffing, and management if the city were to lead. If the county is unable to provide this service and it is left up to cities, we would not be able to explore this until we design and build a new public works facility, which is several years out.

Curbside set-out of items for reuse - optional strategy #27

Golden Valley staff are supportive of this strategy. At this time, we are not interested in hiring a contractor to collect the materials curbside. Instead, we would prefer to leave it up to residents, neighborhoods/community (and possibly Buy Nothing groups) to set out and collect items with the possibility of some promotion from the city. We can explore the coordination of an annual garage sale/cleanup/reuse set out day. We have questions and concerns about property maintenance, staffing capacity, traffic safety issues, and liability concerns with a reuse set-out day. We do not have enough space to combine reuse drop-off with our annual clean up and bulk waste collection event.

Same-day collection - required strategy #30

Golden Valley staff have concerns with this strategy but understand its importance. Does this apply to residential hauling only or does it include commercial as well? If commercial is included, we have concerns since many sites have multiple service days per week.

For residential, who is selecting the service days? Cities would like to pick our service day, but we recognize that could lead to logistical concerns. To alleviate capacity concerns and prevent cities from all picking the same service day, there would need to be a lot of coordination between the county, cities, and haulers. If left up to cities without coordination, it could have implications with hauler capacity, which could impact current contracts and customer service and future bid processes and pricing. Many cities would need to update their city code and would like the logistics figured out before proceeding with those changes. Golden Valley recently updated its ordinance to go from one collection day to two days. We are concerned about political pushback from residents if their day is switched.

Managing wood waste - required strategy #45

Golden Valley staff are supportive of this. Wood waste needs more coordination and to have reliable processing options available. We currently don't have the space or capacity to assist with this item.

Using compost in construction and landscaping projects - required strategy #55

Golden Valley staff are supportive of this and are able to implement this strategy but we would like the flexibility to create our own program. We would appreciate flexibility in tracking our own measures and metrics with how and where compost is used since implementation will depend on projects. Every city is a little different with projects, budgets, and ability to use compost on an annual basis so not being too prescriptive would help make implementation easier for us.

Hello, I am a Property owner in Hennepin County, as well as a frontline worker that has worked on the Metro Transit green line and blue line light rail for The last ten years. I therefore Expect and Demand that the Hennepin County, Solid Waste Management Plan be rescinded. It is not adequate, it is not thorough. It does not take into account many different factors, including and not limited to, the closing of the HERC facility. It does not

take into account mandating factors that are expected of you. It does not take into account, dates and planning of, the closing of the HERC facility, nor what will be replacing the HERC facility. As someone who's been under the HERC facility toxins for the last 10+ years as well as many, many, many of my co workers and the general public going to the twins games, I Demand that you rescind this Solid Waste Management Plan. Do Not Go Forward With It!

The pollution from incinerating plastic products and products treated with PFAS and other chemicals are creating hazardous pollution and impacting the health of the people who live in the area surrounding it. This is unacceptable. Shutting down the HERC should be a priority for the County and should NOT be predicated on getting to zero waste. The HERC is a health hazard, and swift action should be taken to shut it down. The County should work harder to protect the health of ALL its residents.

The plan includes many good actions to reduce waste but it should move more aggressively and make more actions required rather than optional. Surveys show that people are concerned about waste, especially plastic and think government agencies should be involved in addressing the problem. The County could do many more things, including requiring restaurants to use non-disposable dinnerware for all eat-in dining. Restaurants could be prohibited from giving out eating utensils and condiments unless requested. The plan could start a phased-in ban on non-essential single-use plastic. We must focus on actions that result in less plastic being produced rather than focusing on how to better recycle plastic. Recycling is not a solution for the plastic problem. Reduction in the amount of plastic produced and used is key. The County should follow the lead of other counties, states and countries that have shown it is possible to phase out single-use plastic and eliminate, reduce and replace it with sustainable systems.

The Hennepin County SWMP successfully emphasizes the need to develop systems that are accessible to residents (seen in selecting strategies 25, 26, 27, 37, 63, 70), with a particular focus on reuse and reduction. It also emphasizes creating meaningful initiatives to expand Minnesota's circular economy (seen in selecting strategies 42, 52, 67, 69). Supporting cities in their efforts to connect residents with these resources will be critical moving forward and Richfield is excited by the opportunities provided in this plan.

Richfield advocates for the continued development of resources for multi-unit buildings. The contrast in access to and confidence in waste systems between single family and multi-unit housing is real in Richfield and are strongly associated with the influence that race and class have had on these experiences. The SWMP highlights these disparities early on and in its description of the Zero Waste Plan. The City supports these results continuing to guide policy development, particularly when looking at the expansion of strategies 26, 37, 63 and 70, as well as the development of strategy 27.

The City also advocates for developing robust systems for reuse and reduction. Just as organics and recycling have accessible residential systems, resources must similarly be devoted to push reduction and reuse systems beyond the existing County initiatives. We encourage the County to continue to pursue ambitious approaches to move our waste

management efforts up the hierarchy.

Richfield appreciates the opportunity to comment on this plan and the work that has gone into developing it.

I could see the HERC from my house up until I moved earlier this year. My health has deteriorated over the last four years and I believe it is due to the toxins that are produced from burning trash. I've followed along as the commissioners passed a resolution to close the HERC and hear the clear steps that some commissioners are sharing with cities. I understand that responsibilities fall on a number of parties to make this a reality and I see the work is just beginning and have high expectations for what is possible.

Are you all aware of the sharp 20-30% increase in rare and aggressive cancer diagnosis in people under 50? Studies point to COVID and inflammation as a factor for this sharp increase. Even a closure on the early side, 2028, will leave time for the health impacts of the HERC to be told in data. Imagine where these crises intersect in human bodies, the ones you claim to be serving.

The past few years I have developed a skill for being able to know when the air quality in my neighborhood is poor. I get a migraine for days. Are you aware that a hazardous AQI impacts our blood cells? And without rain we are seeing more and more days in the county that are hazardous. Add on top of other toxins. Who is the county serving? It sounds like you are serving the haulers.

Which is another issue. How does a county administrator have so much power in this process? In the span of October to the current time, county staff has successfully undermined the messaging for a closure. I see commissioners doing the hard work but I also see that the plan that was drafted has changed. Like a moving target. This is a waste of funding and can be remedied with specific actions and budget amounts needed to even meet the state-mandated 75% recycling rate by 2030. It can also be remedied by identifying actions that involve commissioner and for other county staff to step back.

This Solid Waste Management Plan is an opportunity for the county to serve the residents and not the contract holders. Bold action led by elected city and county officials can change the health trajectory. That is the real issue here and I am shocked to see county staff send messages that our health doesn't matter more than the trash haulers that can ruin your political career. Step up and do the work.

To the Hennepin Country BOC:

I urge you to refuse a waste management plan that does not begin with the swift closure of the HERC, an unpopular and noxious facility that violates our air quality. This draft does not even outline a phaseout plan within the county's own metrics. Nor does it outline a plan for how to achieve our state recycling mandate of 75% by 2030.

Please do everything in your power to revise this draft, and re-present a viable plan to Hennepin County residents made vulnerable every single day by the HERC.

Thank you,
Hennepin County resident Michelle Garvey

Thank you for the opportunity to comment on Hennepin County's Solid Waste Plan. • This draft plan does not adequately plan for HERC's closure within the time period of this plan, 2022-2042. It is therefore fundamentally deficient. The "Reinventing Hennepin County's Solid Waste System" report is inadequate as a HERC closure plan since it includes no timeline for HERC's closure.

- This draft plan does not mention the County Board Action (BAR 23-0384) passed in October 2023 to create a plan for HERC to close between 2028-2040, which falls within the timespan of this solid waste plan (2022-2042). This plan must include actual planning for HERC's closure if it is to not contradict the county board action.
- This draft plan has reverted back to "first we must get to zero waste before closing HERC." We cannot get to zero waste with a giant incinerator in our waste management system. "Reinventing" the solid waste system requires closing HERC as soon as possible. The county continues to waste many millions of dollars, time, and political will on defending HERC instead of genuinely working to reduce waste.
- The county resolution BAR 23-0384 did not include needing to meet dependencies before closing HERC. Dependencies like "a recycling rate of at least 85%" and "at or near 100% renewable energy" in the state (as recently presented to Minneapolis city councilors) are unrealistic. Dependencies like these are proof that the county is only pretending to respond to public outcry and the board resolution to close HERC -- while business-as-usual continues. Such token efforts are patronizing, misleading, and hypocritical. Especially while the county continues to propagandize HERC and minimize or hide its impacts and risks in tours, presentations, and written materials.
- While this draft plan talks about needing to get to zero waste first, it does not do enough to even meet the state-mandated 75% recycling rate by 2030.

September 5, 2024

Hennepin County Board of Commissioners VIA EMAIL
Government Center A2400
300 South Sixth Street
Minneapolis, MN 55487-0240

RE: Comments on Hennepin County's Draft 2024 Solid Waste Management Plan

Dear County Commissioners:

Thank you for your attention to these comments submitted by the Minnesota Environmental Justice Table and the Minnesota Center for Environmental Advocacy

regarding Hennepin County's Draft Solid Waste Management Plan (the "Plan"). Both our organizations have endorsed the comments submitted today by the Minnesota Zero Waste Coalition. However, we write separately to emphasize several points.

I. The Plan does not adequately plan for HERC's closure within the time period of this plan, 2022-2042. It is therefore fundamentally deficient. The "Reinventing Hennepin County's Solid Waste System" report is inadequate as a HERC closure plan since it includes no definite timeline for HERC's closure. The Metro Solid Waste Policy Plan 2022-2042 specifically includes Strategy 12, which recognizes that Waste to Energy Facilities may close during the planning period. This strategy requires that each County develop plans for the planned closure of facilities like the HERC. Notably, Strategy 12 requires that County plans include an analysis of how the money saved by closing facilities like the HERC could be reinvested to benefit the region. The County's draft Plan does not analyze the financial benefits that would accrue to the County when the HERC is closed.

Further, the Plan does not even mention the County Board Resolution 23-0384 R1, adopted in October 2023, that directed the County Administrator to create a plan for HERC to close between 2028 and 2040, which falls within the timespan of this Plan. The Plan must include a timeline and plan for HERC's closure so as not to contradict the county board action.

II. The Plan contains conditions on HERC closure that are not required by law or by the Metro Solid Waste Policy Plan. This Plan assumes that HERC cannot be closed until zero waste is achieved. This is illogical. We cannot get to zero waste with a giant incinerator in our waste management system. "Reinventing" the solid waste system requires closing HERC as soon as possible. The county continues to waste many millions of dollars, time, and political will on defending HERC instead of genuinely working to reduce waste.

The Metro Solid Waste Policy Plan does not include any pre-conditions for shutting HERC. While the Metro Plan does encourage waste reduction, recycling, and composting, it recognizes that the Metro solid waste system is complex and that large facilities may close. The only precondition required by the Metro Plan for HERC closure is that Hennepin County must first develop a closure plan that covers the items listed in Strategy 12.

Dependencies like "a recycling rate of at least 85%" and "at or near 100% renewable energy" in the state (as recently presented to Minneapolis city councilors) are not required by law. These worthwhile goals should not be adopted by the County as milestones to be reached prior to shutting HERC down.

III. Principles of Environmental Justice dictate closing the HERC as soon as possible. In comments on the County's draft Zero Waste Plan, which were submitted in March 2023, we suggested the County closely consider its obligations to comply with Title VI of the Civil Rights Act, and we encouraged the County to close the HERC expeditiously. In those

comments, we wrote: “[w]hen examined as a whole, the Hennepin County Solid Waste Plan unfairly concentrates the pollution burden of waste on BIPOC County residents through toxic point source pollution from the HERC, as well as added mobile source pollution from the 200 trucks going to and from the HERC each weekday.” To our knowledge, the County has not provided any indication it has considered the impact of Title VI on continued operation of the HERC. Our 2023 comments are attached and incorporated as part of these comments on the Plan.

Thank you for your attention to these comments.

/s/Nazir Khan
Nazir Khan
Minnesota Environmental Justice Table

/s/Evan Mulholland
Evan Mulholland
Minnesota Center for Environmental Advocacy

NOTE: We submitted a PDF of our full formatted comment and a copy of our 2023 comments via email to vital.joe@hennepin.us. for inclusion in this public comment.

September 5, 2024

Hennepin County

Re: Hennepin County 2024 Solid Waste Management Plan DRAFT

Dear Hennepin County Commissioners,

The undersigned organizations, as part of the Minnesota Zero Waste Coalition, appreciate the opportunity to submit comments on the Draft Hennepin County 2024 Solid Waste Management Plan. Our communities need a comprehensive plan that prioritizes waste reduction and strategies that will move us closer to a zero waste economy here in Minnesota. There is too much at stake not to take bold action.

We appreciate Hennepin County’s goal of diverting 90% or more of waste from landfills and incinerators. Yet, while the draft plan meets the required strategies of the MPCA, these strategies are not enough to address the growing waste crisis laid out in the report and related agency reports. The county should be going further with a number of the strategies in order to significantly reduce waste. Additionally, fully implementing these zero waste strategies and meeting these goals should not be needed before closure of the HERC.

We provide the following recommendations to strengthen the plan and position Hennepin County as a Zero Waste leader for the state:

Closure of the HERC is Independent of this Plan:

The draft Plan does not mention the October 24 County Resolution (23-0384 R1). This Resolution directed County staff to prepare a plan for HERC closure between 2028 and 2040. Further, the draft plan fails to mention that the "Plan to Reinvent Hennepin County's solid waste system " contains a HERC shut down plan that can be begun immediately. These items should be added to the County Plan. Related to the closure:

MN Stat. § 473.803, subd. 1 requires County plans to describe "proposed mechanisms for complying with the recycling requirements of section 115A.551," which includes a mandate to recycle 75% of all solid waste by 2030. (See MN Stat. § 115A.551, Subd. 2a(2)). The draft plan does not adequately explain how the County will meet this goal.

MN Stat. § 473.803, subd. 1 requires County plans to include "existing rates and charges to users" of the HERC. The plan fails to include this.

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Utilization of SCORE Funding:

With the passage of the Packaging Waste & Cost Reduction Act this past legislative session, a significant percentage of recycling costs held by the county will be covered by the new Producer Responsibility Organization. Despite this new program, we agree that policy is needed to ensure a larger percentage of state revenue from the Solid Waste Management Tax is used towards SCORE in order to fully fund zero waste strategies. However, the priority for allocation of SCORE dollars should go to funding and scaling strategies at the top of the waste hierarchy - reduction, equitable and scaled reuse and refill systems, and community-based composting - that have not historically been well funded by SCORE and are not covered sufficiently or at all under the new Packaging Reduction law. We are concerned that the county would prioritize state bonding funding

for recycling recovery facilities over proven zero waste strategies that we are seeing scaled in communities across the globe. Capture of metals at landfills and incinerators should be required, but mixed-waste processing is a poor strategy for other recyclables and does not result in materials that are the high quality needed to build circular supply chains (see also strategy #36)

Food Waste Elimination and Diversion

While we appreciate the County's acknowledgement that Recycling Ordinance 13 needs revisions and improved enforcement, the County should be a leading advocate for state policy change that prevents food waste from being landfilled or incinerated. The bedrock policy that catalyzes food recovery and is most effective at preventing organic waste from landfill or incineration is a mandatory organic waste ban. To date, about a dozen states have implemented an organics ban, including California, Connecticut, DC, Maryland, Massachusetts, New Hampshire, New Jersey, Rhode Island, Washington, and Vermont. Policy is needed in Minnesota to phase out organic food waste from landfills and incinerators while investing in programs that reduce food waste, educate and assist consumers, address food insecurity, and cultivate food waste recycling infrastructure like composting. (Related strategies include 40, 41, 42)

Reduce Single-Use Plastics & Packaging

In addition to supporting local ordinances and state legislation that reduces or eliminates single-use plastic, Hennepin County should be leading by example. It is not enough to simply "explore adopting a countywide policy on reusables at county events." Rather, it is past time to take action. Hennepin County should be a leading example of waste reduction strategies. Public events and public spaces should be zero waste and zero waste requirements should be embedded in government contracts. Additionally, the Biden Administration announced a new goal to phase out federal procurement of single-use plastics from food service operations, events, and packaging by 2027, and from all federal operations by 2035. If this is something the federal government can act on, Hennepin County should be well on its way to eliminating single-use materials at its events and embedded in its contracts. (Related strategies 19, 22, 23)

Improving Data

We agree that increased data is needed to better understand both the waste crisis and our progress towards reduction. We disagree with strategy #3 - while Hennepin county does not operate a landfill, we do need waste composition studies at transfer stations. This data is important to better understand capture rates.

Education and Outreach

There should be standardized education for the types of material collected and clear instructions for proper disposal of various- material . However, education messaging needs to meet community needs and cultural differences. We hope to see improvements in education that meet the community where they are at. (Related Strategy #10)

Reuse

The County should be going further to scale reuse across communities. Strategy #22 simply encourages the use of reusable food and beverage service ware. The county should be working to advance an ordinance and/or state legislation that phases in requirements for reusable serviceware. This should go hand-in-hand with scaling strategy #30 - grants for waste reduction, reuse, and repair. If we are going to support equitable access to reuse and refill programs, we need better funding mechanisms that go beyond comparatively small grants, including low-interest loans for innovative, sustainable, reuse startups and businesses.

Collection Best Practices

Hennepin County needs to look carefully at cost effective collections methods. The reason for not implementing weekly recycling and organics collecting (strategy #31) could be mitigated by moving to biweekly trash collection (strategy #32). Additionally, with the implementation of the new Packaging law, there is a potential need for weekly recycling. Hennepin County should have a plan if and/when that need arises.

Residents want to do the right thing when it comes to the environment and waste. But people often lack accessible systems to participate in waste reduction and reuse or equitable and affordable options to do so. Hennepin County has an important role to play in helping advance effective strategies that can work across communities. We hope to work with the county in advancing this work. We are happy to provide additional information on any of these recommendations and appreciate your consideration of our comments. If you have questions, please contact B. Rosas (b.rosas@climategen.org) and Maria Jensen (mjensen@reca-us.org), MN Zero Waste Coalition Steering Team members.

The following organizations sign-on in support of these comments:

Minnesota Zero Waste Coalition
Beyond Plastics Greater Mankato Area
Clean Water Action
Climate Generation
Coalition for Plastic Reduction
CURE
Elder Climate Action
Mankato Area Zero Waste
Minnetonka Climate Initiative
Minnesota Center for Environmental Advocacy
Minnesota Environmental Justice Table
Minnesota Interfaith Power & Light
Northeast Metro Climate Action
Recycling Electronics for Climate Action (RECA)

Sierra Club North Star Chapter
St Luke Presbyterian Church
West Metro Climate Hub

The plan seems workable and effective. Perhaps a reduction on profit tax for reuse sellers would increase that outcome.

I was reviewing this document and I think it is important that there be a solid and binding commitment to a timetable for the closure of the HERC. Right now it includes no explicit timetable. Without a fixed and binding deadline, there is no reason county officials could not continue to operate the incinerator indefinitely. As a result, I and those in the #ACTIVIST groups I am with feel that this plan leaves a dangerous wide-open escape hatch from the commitments it claims to put forward. Please adopt a revision including a definite timetable with binding deadline. Thanks.

This draft is deficient because it includes no timeline for HERC's closure. In fact, it fails to even mention County Board Action (BAR 23-0384) passed in October 2023 directing staff to create a plan for HERC to close between 2028-2040.

Instead, the draft reverts back to "first we must get to zero waste before closing HERC." We cannot get to zero waste with a giant incinerator in our waste management system.

As you know, HERC is the largest industrial source of air pollution in Hennepin County. The incinerator burns tons of trash from Minneapolis and suburbs across the county. For 230,000 people living in adjacent neighborhoods -- mostly made up of low-income folks and people of color -- dirty air, chemical fumes, and the risk of poor health have become part of daily life. HERC's pollutants trigger asthma attacks, and contribute to heart attacks, strokes, cancers, birth defects, learning disabilities, and other harmful health outcomes.

I expect Hennepin County to share the urgency of North Minneapolis neighbors who cannot breathe. You must first shut down the HERC, then transition to a zero-waste economy so we no longer need to burn or bury our trash. All of us can reduce, reuse, and recycle more.

'Minnetonka – Hennepin County Solid Waste Plan Comments
09/05/24

Page: 7: As local governments, counties and cities must deal with the trash problem with little influence over what is produced and limited resources to deliver convenient services to recover and reuse the materials
- Important note and message from the county.

Page 8: The MPCA Metropolitan Solid Waste Management Policy Plan 2022-2042 has a goal of recycling/composting 75% of solid waste by 2030. Current recycling rates fall far short of this goal. This plan has a goal of 90% which seems very unlikely could actually be achieved.

Page 10: Establish Encourage cities to host a curbside set-out day to allow residents to set out used items for reuse or accept reusable items at drop-off collection events.

Page 10 and 36: Using compost in construction and landscaping projects (required strategy #55)

- This appears to be focused on public projects (done by the city). The city will continue to utilize compost when possible on city projects, however does not currently require on non-city funded projects.

Page 10 and 29: 27. Establish Encourage cities to host a curbside set-out day to allow residents to set out used items for reuse.

Page 10 and 30: Contract for residential recycling and organics by 2030 (optional strategy #33):

- The city currently has organized recycling, and is considering options to also have organized organics collection.

Page 11: Wood waste (required strategy #45): Most haulers said they don't handle tree waste . One hauler that owns a yard waste site agreed that more needs to be done to support capacity.

-Management of wood waste is a major concern given there are not enough options for disposal and/or reuse. The city supports the county's involvement in the statewide wood waste stakeholder group which is trying to address this issue (and the City Forester is also participating) along with developing a wood waste management plan in 2026.

Page 15: Hennepin County currently passes all of its state recycling funds, called SCORE funds, through to cities to support their residential recycling programs . However, this funding only covers a fraction of the cost needed to run these programs, and the needs of today's recycling system are different than 30 years ago . Counties and cities have expanded services beyond traditional recycling to include new organics recycling programs, more work on multifamily recycling, additional education and outreach, and more emphasis on waste prevention and reuse, but SCORE funding hasn't increased to match the needs of today's system and state targets for counties .

- Another important note and message from the county.

Page 16: Ban recyclable and organic materials from landfills: There are currently no landfills located in Hennepin County. This seems to be an overreach to place requirements on something not located within the county. Recommend Hennepin

County build a landfill in the county to accept and manage material generated within the county.

Page 17: The Zero Waste Plan includes an action to work alongside cities and haulers to define roles and responsibilities and establish a roadmap to transition the county to more organized hauler collection systems .

- This item would require further discussion and coordination with city manager and elected officials due to the impacts to cities.

Page 20: Mandates to participate in recycling and composting programs would put a large burden on cities and require hiring a significant number of staff for enforcement, and greatly increase costs to residents.

Page 28: 23 . Encourage cities to adopt an ordinance with a mandatory consumer charge or ban for single-use items

- If the plan is to work with cities, the county should consider ways to encourage cities to adopt a mandatory consumer charge or ban single-use items. One idea is to collect program data from Edina, Minneapolis, and St. Louis Park with other cities in Hennepin County. The success of these programs could help encourage cities to take similar action.

Page 29: The county also recently received an MPCA grant to host swap events . Several cities, including Edina, Minneapolis, and St Louis Park, have hosted swap events in recent years for residents to exchange goods like garden tools and clothing . The grant funding will build on those efforts and expand swaps throughout the county.

- On May 11th City of Minnetonka hosted its first annual clothing swap. Please add the City of Minnetonka to this list with Edina, Minneapolis, and St. Louis Park. Info here: <https://www.minnetonkamn.gov/Home/Components/Calendar/Event/2745/1224?curm=5&cury=2024>

Page 31: 37 . Provide assistance to multifamily properties to improve recycling (4 or more units with shared walls) .

- The county should consider funding opportunities to encourage new multifamily developments to provide organic recycling within their facilities.

Page 32: Current county and state mandates regarding curbside organics collection require all single family households to pay for curbside organics collection whether they participate or not. It appears conflicting to encourage backyard composting while requiring homeowners to pay for and participate in curbside collection, and finding ways to promote together would be useful. Fewer food items can be composted in a backyard system and are not as efficient as commercial scale composting facilities.

Page 33: 43 . Establish additional organics recycling drop-off sites.

- This item looks to continue to support cities drop off sites; however, is the county able

to establish Hennepin County Drop Off sites or are there other partnership opportunities? Some other counties (for example, Dakota County) have county run organic drop off locations.

Page 33: Recommend utilizing HERC for wood waste to use as an energy source that will not emit additional carbon, as the wood may likely release similar amounts of carbon from decay alone.

Page 36: 55 . Require food-derived compost in county construction and landscaping projects.

- It is reasonable to work with cities to consider working together, however requiring this may be challenging and costly to cities without assistance from the county. The bottom part of this section states, "The county will also work with cities to encourage use of food-derived compost in infrastructure projects and will explore requiring this of cities."

Overall: The plan indicates a goal of recycling 90% of solid waste. The plan also identifies and describes many sources of waste and means to reduce or manage the waste. The plan does not describe what will be measured and quantified to be included in the 90% goal. Define measurable goals to be able to demonstrate progress towards achieving a 90% recycling/compost goal.

I appreciate the efforts to reduce waste within the County; SO important, and the County can and should take as much leadership as it can to incentivize and mandate reduction in the first place.

But importantly, I also am concerned about the air quality issues and ash contamination generated by ongoing use of the HERC. I don't see that this plan addresses the (Henn Co Board- required) closure of the HERC, nor planning for that closure- in this plan, and it needs to be. Thank you!

'Comments on the Draft Hennepin County Solid Waste Plan

Dear Commissioners,

The following are my comments on the draft Hennepin County Solid Waste Plan (hereafter referred to as the plan). I commend the County for presenting plans that take the need for environmentally sound waste management more seriously. However, its lack of clear commitment to closing the HERC facility in the near future shows less concern for public health, especially for residents of environmental justice (EJ)

communities.

Thank you for providing this opportunity to provide the following comments.

- Doug Gurian-Sherman, Ph.D.
Minneapolis resident

1) The County Plan Fails to Set a Near-Term Closure Date for the HERC Incinerator, Jeopardizing Resident's Health and Contradicting the Plan's Claims for Prioritizing Environmental Justice.

The HERC incinerator causes public health harm to County residents. Its operation is based on an outdated 1998 permit that does not consider the cumulative harm of the many air pollutants it produces and has not been updated for more stringent air pollution standards such as for particulate matter and NO₂. It also does not account for the substantially greater susceptibility and vulnerability of environmental justice (EJ) community residents to air pollution that is widely accepted by the risk assessment science community, among other shortcomings.

Furthermore, it is clear from the County's own data that residents nearer to the HERC are at substantially greater risk and exposure from HERC pollutants than residents farther from the facility. These nearby residents make up a much greater percentage of EJ residents than in communities at greater distance from HERC in the County, as determined by MPCA criteria for EJ communities and census data.

Page 14 of the plan notes that: "In June 2020, the Hennepin County board declared racism as a public health crisis." Additionally: "Hennepin County is committed to making sure pollution does not have a disproportionate impact on any group of people – the principle of environmental justice. This means that all people – regardless of their race, color, national origin, or income – benefit from equal levels of environmental protection..." [p.14, column 1, last paragraph].

My assessment strongly suggests that the above text is contradicted by the County's own data and analysis. Furthermore, the current broad range of closure dates, 2028-2040 is essentially meaningless and makes a mockery of any serious plan to close the facility. The facility must be closed as soon as possible, and certainly no later than 2028 for the County's rhetoric about EJ to have any serious meaning.

2) The County has Set Unreasonable Roadblocks for the Closure of HERC to the Detriment County Residents' Health.

The County has published or presented contradictory statements about the requirements for closing HERC. For example, p.21, paragraph 3 identifies the dashboard of target waste management practices. This dashboard is from the county's February 2024 report "A Plan to Reinvent Hennepin County's Solid Waste System". The introductory text for its dashboard from the February plan on page 27 remarks: "Using this direction as guideposts, staff recommend establishing a zero-waste dashboard to

define the criteria to be met to responsibly close HERC...” [Emphasis added]. However, on the following page, only “progress” toward the 2030 goal of 75% recycling in the dashboard is required. These texts are unclear at best and possibly mutually contradictory and should be clarified to say that all the dashboard goals, while laudatory, are not required for HERC closure. Otherwise, for example, even meeting the 75% recycling goal on time would remove closure earlier than 2030, contrary to the earlier dates in the 2028-2040 timeframe.

Furthermore, the dashboard goal of zero increase in landfilling above 2022 levels is unclear. It does not specify the time frame that would measure exceedance (e.g. a single year, or an average of multiple years?). While it would be desirable to immediately begin reducing landfill use, that must not come at the expense of continuing harm to residents of Hennepin County from HERC. The predominant concern about landfills repeatedly expressed by both the County and MPCA is greenhouse gas emissions (GHG), specifically methane. However, this GHG is produced from anaerobic metabolism by microorganisms in the landfills of organic substances, overwhelmingly food and yard wastes, not from all of the many waste products disposed of in landfills. Therefore, it is these organic substances, not the overall waste disposed in landfills, that should be the target based on the predominant concern of the County. Therefore, the current recommendation lacks adequate specificity and is not scientifically supportable.

Additionally, it ignores the substantial GHGs produced from incineration.

But it is also important to consider the longer-term trends for waste management rather than a myopic fixation of very short-term landfill use reflected in the 2022 landfill limit. The current vague and ambiguous recommendation should be changed to allow short term temporary increases in landfilling in order to prioritize public health by closing HERC, while longer term trends toward reducing landfill use are achieved.

Finally, the waste hierarchy is over 40 years old and is not supported by current risk science. Although the hierarchy is enshrined in state law (which should be changed) that does not justify the obsession of County and some state staff that treats landfills as extremely worse than incineration. There has been no recent comprehensive risk analysis or assessment that I am aware of that robustly compares incineration and landfill risks side-by-side. In fact, in terms of public health, incineration is likely to have substantially more grave direct consequences, especially to EJ residents. The science does not support County staff’s one-sided perspective. The County should end this biased approach that it has not supported with any comparative risk assessment and instead support closing HERC soon.

3) The County has Apparently Added New Specific Conditions for Waste Management before HERC Can be Closed.

In its presentation to the city council of Minneapolis in August, several “dependencies” were presented as necessary to be achieved before HERC can be closed. These, to my knowledge, were not previously included in the County resolution on closing HERC from October 2023 (BAR 23-0384). These additional criteria represent an apparent betrayal of

the commitments the County Commission made in its October resolution.

For example, these discrepancies included an 85% recycling rate, which exceeds the previous commitment to achieving 75% recycling which I mentioned above. This requirement would almost certainly push the closure date of HERC to at least several years past 2030. Similarly, achieving 100% renewable energy has also been added, which is also likely to delay HERC closure. It is hard to believe that County staff are not aware of the likely effects of these new conditions. Again, while laudable, they seem to reflect the continuing bias of County staff toward favoring municipal waste incineration. For example, given the greatly reduced costs of truly renewable and 100% carbon free energy such as wind, solar, and storage, it would make more sense to invest the substantial capital costs for operating HERC into such sources if these goals are truly desired, as they should be.

Therefore, the County should revise its report to remove these “dependencies” which prolong the harm from HERC.

In summary, while the current draft plan is in some ways a step forward for Hennepin County waste management, it is seriously flawed and lacking when it comes to public health, especially at the expense of EJ residents that the County claims to want to remedy. The County needs to revise its plan to reflect the concerns addressed above, and close HERC by 2028 at the latest.

Zero waste before the shut down of the HERC is neither necessary, nor practical. The trash incinerator serves as a convenient crutch for the county, allowing staff to avoid investing time and energy into developing legitimate zero waste solutions for waste reduction and diversion. It delays the pursuit of sustainable, and beneficial initiatives that tackle waste crisis at the root of the problem. The HERC leaves people with the false impression that they don't have to think too hard about waste since it will miraculously "turn into energy". The millions of dollars that go into running the incinerator could instead be allocated into EDUCATION, resources that assist culture and habit shifts, better recycling, reuse centers, and local composting and food rescue, etc. The County also needs to support and back zero waste advocates during the legislative session instead of covering being/supporting lobbyists for business who depend on and encourage hyperconsumption and waste for business. The climate crisis demands bold and fast action.

'[Resubmitting the MN Zero Waste Coalition Comments with additional sign-ons]

Re: Hennepin County 2024 Solid Waste Management Plan DRAFT

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Solid Waste Management Plan. Our communities need a comprehensive plan that prioritizes waste reduction and strategies that will move us closer to a zero waste economy here in Minnesota. There is too much at stake not to take bold action.

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There should be standardized education for the types of material collected and clear instructions for proper disposal of various- material . However, education messaging needs to meet community needs and cultural differences. We hope to see improvements in education that meet the community where they are at. (Related Strategy #10)

Reuse

The County should be going further to scale reuse across communities. Strategy #22 simply encourages the use of reusable food and beverage service ware. The county should be working to advance an ordinance and/or state legislation that phases in requirements for reusable serviceware. This should go hand-in-hand with scaling strategy #30 - grants for waste reduction, reuse, and repair. If we are going to support equitable access to reuse and refill programs, we need better funding mechanisms that go beyond comparatively small grants, including low-interest loans for innovative, sustainable, reuse startups and businesses.

Collection Best Practices

Hennepin County needs to look carefully at cost effective collections methods. The reason for not implementing weekly recycling and organics collecting (strategy #31) could be mitigated by moving to biweekly trash collection (strategy #32). Additionally, with the implementation of the new Packaging law, there is a potential need for weekly recycling. Hennepin County should have a plan if and/when that need arises.

Residents want to do the right thing when it comes to the environment and waste. But people often lack accessible systems to participate in waste reduction and reuse or equitable and affordable options to do so. Hennepin County has an important role to play in helping advance effective strategies that can work across communities. We hope to work with the county in advancing this work. We are happy to provide additional information on any of these recommendations and appreciate your consideration of our comments. If you have questions, please contact B. Rosas (b.rosas@climategen.org) and Maria Jensen (mjensen@reca-us.org), MN Zero Waste Coalition Steering Team members.

The following organizations sign-on in support of these comments:

Minnesota Zero Waste Coalition
Beyond Plastics Greater Mankato Area
Clean Water Action
Climate Generation
Coalition for Plastic Reduction
CURE
Elder Climate Action
Health Professionals for a Healthy Climate
Mankato Area Zero Waste
Minnetonka Climate Initiative
Minnesota Center for Environmental Advocacy
Minnesota Environmental Justice Table
Minnesota Interfaith Power & Light
Northeast Metro Climate Action
Recycling Electronics for Climate Action (RECA)
Sierra Club North Star Chapter
St Luke Presbyterian Church
Twin Cities Democratic Socialists of America
West Metro Climate Hub
Women's Environmental Institute

The draft plan is meant to extend until 2042, past the 2028-2040 closure timeframe for HERC that the County Board adopted almost a year ago. But the plan is significantly lacking when it comes to addressing HERC closure, and doesn't even mention last October's closure plan vote.

Almost half of the County's trash is currently incinerated at the HERC, so a solid waste plan without concrete steps, timelines, and budgets for moving ahead with HERC closure is just not credible, on top of failing to comply with the the Board Action taken by the elected representatives of the County's residents.

Pursuing ambitious zero waste goals is an important way Hennepin County can achieve not only responsible and effective management of the solid waste system, but also improve public health, equity and quality of life for all of us. However, every day that HERC continues operating, it is actively and disproportionately harming all of these.

The incineration of materials containing PFAS 'forever chemicals' alone is spreading these toxic carcinogens across the entire county and beyond, up to 150 miles. Hennepin County needs to take responsibility and demonstrate a sincere commitment to HERC closure in this plan.

Thank you for the opportunity to provide feedback on Hennepin County's draft 2024 Solid Waste Management Plan.

Reuse Minnesota strongly supports actions that prioritize waste reduction, reuse, and repair, all of which are a large focus of the MPCA's Metro Solid Waste Management Policy Plan. As such, we have comments on the following strategies discussed in the County's plan.

16. Implement a formal county sustainable purchasing policy using MPCA guidance.
Reuse Minnesota supports the adoption of a formal sustainable purchasing policy by the County. To ensure the greatest benefit, we would like to see it noted in this plan that this policy will prioritize refurbished, remanufactured, and other reused products whenever possible.

19. Offer grants or rebates for organizations to transition to reusable food and beverage service ware.

Reuse Minnesota is a strong supporter of the County's grants and support for businesses working to switch to reusables. We would like to see the County go further and consider adoption of an ordinance requiring the use of reusables for on-site dining, including beverages. While we realize a requirement like this goes beyond the strategy requirement by the MPCA, there is precedence and significant resources from reusables advocates across the country to provide guidance in creating such a policy.

21. Implement a green meeting policy.

We support the County in adopting a green meeting policy, but like the purchasing policy, we would like to see this strategy description expanded upon in this plan to highlight the intention to prioritize reuse and waste prevention in the policy.

22. Implement a county policy encouraging the use of reusable food and beverage service ware.

During the MCPA's public input process, Reuse Minnesota provided feedback on this strategy through our leadership of the Minnesota Reusables Coalition. As we stated in September 2023, this strategy should be required, not optional. If the state and county are asking residents and businesses to implement reuse, it is imperative that local and county governments lead by example. Further, this is an opportunity to engrain reuse as a cultural norm for the public. We recognize this may require a phased approach, but it should be required and not just "encouraged" by the County.

23. Adopt an ordinance with a mandatory consumer charge or ban for single-use items.

Reuse Minnesota understands the idea behind utilizing fees to motivate behavior change, but an ordinance requiring fees needs to be done with extreme care. Fees are complicated at best and ensuring equitable impacts is challenging. Many factors need to be taken into consideration before determining if such a policy would not cause overly burdensome impacts on lower-income communities in particular. The new staff person

should look to other communities both in Minnesota (Minneapolis and Duluth) and in other parts of the US to understand these considerations, as well as how such an ordinance would interact with the Packaging Waste and Cost Reduction Act.

24. Join and/or actively participate in a reuse network, like Reuse Minnesota, to provide county and city staff with learning opportunities to broaden their reuse expertise. Thank you! We also greatly appreciate that many cities in the county are members including Bloomington, Brooklyn Park, Edina, Minneapolis, Richfield, and St. Louis Park. We would love to see more Hennepin County cities join!

25. Establish a Repair Ambassador program, like the Recycler/Composters (RCAs) Ambassador programs. Kudos on being the fix-it clinic leader in Minnesota!

27. Establish a curbside set-out day to allow residents to set out used items for reuse. We would love to see more cities offer regular collection of bulky reusable items, as the City of Bloomington offers. While single-day events are certainly useful, they are easily missed due to other obligations, travel, illness, religious observances, and inclement weather. Working with reuse organizations to collect items at the curb on a regular basis provides more equitable access across communities, and avoids the issue of households opting for disposal because items cannot be picked up in a timely manner. As a complement, the idea of reuse hubs has been discussed in various channels. If curbside collection of items isn't a service enough existing organizations can provide, it may be worth considering if the County could host a central collection (a reusables transfer station) where a single entity could collect and drop off items, and then nonprofits could pick them up. In addition, there are numerous existing "junk" haulers that state they maximize reuse prior to disposal. If these claims could be verified, maybe there are options for the County or cities to offer vouchers or other support for curbside collection via these existing businesses.

Thank you for your consideration of this feedback.

Emily Barker
Executive Director