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Goodhue County
Public Works

Memorandum

To: Goodhue County Public Works Department - Solid Waste
From: Red Wing City Council and Mayor
Date: December 9, 2011

The City of Red Wing has reviewed the majority of the County's Solid Waste Plan and has opted to provide general comments regarding the content, conclusions and consistency with the policies, goals and statutory intent with respect to the responsibilities for implementation and operation of solid waste management programs.

Content

Many sections within the Plan contain information that is outdated, obsolete or irrelevant in terms of its usefulness in planning and implementation of programs. Program descriptions contained within the Plan describe initiatives that were proposed during the last planning period that have never been implemented, measured or reported such as Waste Reduction, Waste Education, Recycling, Yard Waste Composting and other Recycling / Collection Programs. If the program and policy proposals have seen no action in the 5 years since they were first proposed, what is the point of stating these initiatives again?

The City of Red Wing is currently engaged in several initiatives to increase recycling, reduce waste disposal and enhance levels of service provided to the regions residents and businesses. For instance, in 2011 the City of Red Wing increased public access opportunities at the Waste Campus by providing more than twice as many hours of public access for drop-off of self-hauled wastes and recyclables at the Waste Campus. The City of Red Wing also added receptacles for free recyclable material drop-off for residential quantities of recyclable materials and has successfully implemented and operated the City's Front-End-Fuel-Cleaning (FEFC) operation and Material Recovery Facility (MRF) for the processing of solid waste and source separated recyclable materials from curbside collection.

The Plan fails to provide a clear link as to how the County intends to support this public investment to promote and achieve enhanced levels of materials recovery or through the maximization of available capacity.

Finally, the Plan needs to set clear goals with timelines and benchmarks in order to actually determine some level of program success and eliminate proposals that cannot be feasibly implemented and measured.

Conclusions

Within the Plan, the County states "Goodhue County citizens have again clarified that land disposal is not an option of preference and that they support incineration but not a mandate to use the Red Wing Incinerator". This statement and other similar statements appear to be made based solely upon anecdotal evidence rather than empirical proof. The City refutes the premise of these statements and assertions and offers the following information.

The City of Red Wing has been the principal entity responsible for solid waste and recyclable material management in Goodhue County since 1982 and currently serves the following communities and townships within Goodhue County:

Red Wing
Lake City
City of Goodhue
Wanamingo
Bellchester
Prairie Island
Wacouta Township
Goodhue Township
Zumbrota (commercial waste)
Cannon Falls (Estimated Over 50% of Community)
Pine Island (Goodhue County Portion Only)

The only community within Goodhue County that does not use the Red Wing Waste Campus as their disposal facility for at least a portion of the waste generated within the City is Kenyon and there is an opportunity for Kenyon to also use the Waste Campus when its municipal collection contract expires in 2012. Over the last 2 years, the City has conducted general opinion surveys and scientific polls to gauge the level of support for City programs and services. These surveys and polls have always found that the majority of the public support the continuation of Waste Campus operations and State hierarchy includes incineration as preferred over landfilling. The City's system/operations are the highest environmentally sound method of management available in Goodhue County.

Statutory Intent:

Minn. Stat. § 115A clearly states the goals, policies, and intent of the legislature with respect to solid waste management which is to protect the state's land, air, water, and other natural resources and the public health by improving waste management in the state in order to reduce the amount and toxicity of waste generated, increase the separation and recovery of materials and energy from waste, and coordinate the statewide management of solid waste and the development and financial security of waste management facilities, including disposal facilities.

Minn. Stat. § 400 provides authorization to protect the state's water, air, and land resources so as to promote the public safety, health, welfare, and productive capacity of its population. It is in the public interest that counties conduct solid waste management programs. However, the County has clearly showed little interest in pursuing these goals through the infrastructure that the State and the City have made significant public investments in.

In assigning responsible units of government to manage solid waste programs, the State reasonably expects public entities to act in the best interest of the public and the County's failure to direct waste to superior disposal options within its own political subdivision cannot be reconciled with good public policy or responsible government.

The City would request a clear response from both the State and the County as to how this Plan can be approved based on the multitude of inconsistencies with Minn. Stat. § 115A and the State Planning Rules 9215.

The Red Wing City Council, Mayor and staff look forward to the opportunity to work collaboratively with Goodhue County to address the City's concerns and to insure the Goodhue County Solid Waste Plan is approved in an environmentally responsible manner.