



Our mission is to reduce waste today through innovative resource management and to reach a waste-free tomorrow by demonstrating that waste is preventable, not inevitable.

December 17, 2013

Rich Lallier
Director, Department of Public Works
City of Saint Paul
1500 City Hall Annex
25 W. Fourth Street
Saint Paul, MN 55102

Re: Request to Adopt City Solid Waste Goals

Dear Rich:

Thank you for recognizing our work in partnership with the city and our commitment to Saint Paul having high quality, innovative, and cost-effective programs. We are inspired that the city has taken an interest in setting goals for recycling and composting. We would like to offer the following feedback as you gather tomorrow for your briefing.

Saint Paul's Goals

The current staff proposal is to achieve 35% diversion by 2016 moving to 45% diversion by 2020 based on a current recycling rate of 20-22%. We understand that the 20-22% recycling rate is based on an estimate that breaks out the residential portion of the Municipal Solid Waste (MSW), stream. MSW includes *Residential* as well as *Commercial, Industrial, and Institutional (CII)*. This is different from how Saint Paul's recycling rate has been measured or reported in the past.

To date, the City of Saint Paul, Ramsey County, and Eureka have always explained that the recycling rate is approximately 47% based on the overall MSW recycling rate. (The recycling rate is also an estimate. It is impossible to calculate an actual recycling rate in Saint Paul because there is no organized collection of waste data. However, we do know exactly how much recycling is collected residually.) There are residents that have been following this current recycling rate and it is confusing and demotivating for residents to go from the Ramsey County reported 47% recycling rate to a recycling rate of 22% without at least an explanation.

We understand that the new diversion estimate of 20-22% (based on recycling only) does not include CII; Saint Paul businesses like Trotter's Cafe and the Heartland Restaurant and Farm Direct Market, institutions such as St. Thomas, Macalester College, and Saint Paul Public Schools, or industry such as Salsa Lisa. We presume that is because the city is leaving the commercial sector (and we assume institutions and industries as well) to Ramsey County so these targets are not incorporated into the staff goals for Saint Paul.

2828 Kennedy Street NE \ Minneapolis, MN 55413 \ (651) 222-7678 \ Fax (612) 623-3277 \ www.eurekarecycling.org

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We are in agreement with setting residential goals, but we believe it is better to set the goals in the context of the city as a whole. Today we are at 46.7%, which is the recycling rate reported by Ramsey County in the 2010 SCORE Report. (This number includes residential and CII recycling. It does not include the generic estimates the county adds to every county's SCORE report of 3% for source reduction and 5% for yard waste.)

The maximum amount of MSW that can be recycled is 75%. The following goals call for 70% of all MSW to be recycled through residential and CII goals. It will take additional policy goals to achieve 100% (or darn near) recycling, which we address in a later section.

Therefore, for recycling diversion we recommend these goals:

	State of MN Current	Saint Paul Current	Saint Paul 2016	Saint Paul 2020	Saint Paul 2025	State of MN 2030
Recycling Diversion	45-48%* of Minnesota's waste stream is recycled	47% of MSW is recycled*	60% of MSW is recycled **	65% of MSW is recycled***	70% of MSW is recycled***	53-60% of Minnesota's waste stream is recycled

*includes CII and residential

**includes only additional residential goals, an increase of 12-13% residentially as proposed by staff. No increase in CII.

*** includes additional residential and CII goals

While the city is focused on residential goals for the short term (2016), we believe it would be best to include some CII goals for Saint Paul for 2020 and 2025 so that we can reach our broader mutual goals. This would bring us to the city's zero-waste vision for recycling, as adopted in 2006.

This approach does not leave behind the community members who have been inspired by and working toward zero-waste goals as the city sets practical immediate objectives. This is a way we can include everyone in the city's vision and goal setting to inspire people to change what they can actually impact.

The Benefits of Recycling Goals Based in Zero Waste

While some would say that a zero-waste goal is unrealistic, many cities and leaders across the country are pursuing just such visionary goals. There are many benefits of using zero-waste visionary goals, for example as a guide for making practical decisions and setting policy. There are communities and businesses within Saint Paul that have currently adopted zero-waste goals and look to the City of Saint Paul to lead in the effort to create systems where nothing is wasted and/or hold the ideal that in the future it is possible that nothing will be wasted.

Moving Beyond Recycling to Organics

While the city is setting goals to achieve 100% recycling or darn near (which is zero-waste recycling), the city's organics goals are still unclear.

According to the Wilder Report, nearly 70% of residents from all over the city of Saint Paul said they were either willing (29%) or very willing (38%) to separate their organics now. As the staff recognized, the recent MPCA Waste Composition Study shows us the importance of diverting this material: 31% of what is in our trash now is organic waste that could be composted.

We hear loud and clear that the residents and the city leaders understand the importance of organics diversion, but the proposed goals will not result in the diversion of this material.

- Saint Paul residents throw away an average of \$96/household/month of food that could have been eaten and food scraps are in the garbage instead of backyard bins. The most cost-effective method to address organics collection starts with prevention education. Eureka initially proposed \$0.14/household for prevention and backyard waste education, which has been reduced to just \$0.04/household in the city's budget.
- The next most cost-effective method is curbside collection with recycling. In 2015 the recycling program will transition to carts and this is the most economical time to add the organics collection. There is no stated reason for waiting until 2016. In the meantime, every single year we are not composting is the equivalent to the annual emissions from 1,105 cars. Furthermore, residents are not able to significantly reduce their garbage, which could result in a net savings of \$7.20 annually for every household. By composting, our community reduces pollution and saves an average of \$691,831 in health and remediation costs and could create 5,500 tons of nutrient-rich soil amendment (3.5 acres a foot deep) every year.

The maximum amount of MSW that can be composted is approximately 20%. The following goals call for 15% of all MSW to be composted through residential goals. It will take additional policy goals to achieve 100% (or darn near) composting, which we address in a later section.

Therefore, for organic diversion we recommend these goals:

	Ramsey County Current	Saint Paul 2015	Saint Paul 2016	Saint Paul 2020	Saint Paul 2025	State of MN 2030
Organics Diversion	7% of MSW is composted	7% + <1% of MSW is composted*	10% of MSW is composted**	12% of MSW is composted**	15% of MSW is composted**	9-15% of Minnesota's waste stream is composted

*assumes Saint Paul is same as Ramsey, <1% is for drop-off and \$0.04/household/year investment of prevention education

**assumes addition of curbside composting and additional prevention education

Participation Rate Used to Measure Results

The last time the City of Saint Paul and Eureka performed an accurate measure of the participation was in 2001 during the Recycling Collection Study. No one has performed any participation rate analysis since then. At that time the baseline participation rate was estimated at 71%, with an average set-out rate of 46%.

Most cities do not know their participation rate because it is a labor intensive (and expensive) process. There is a national standard for calculating set-out and participation rates. The set-out rate is the measure of what percentage of households set out material in any given week. The participation rate is the number of households who ever participate in the program over a set period of time, usually 10-12 weeks.

We recommend a true participation rate study after the transition to single stream and additional plastics. Saint Paul needs and deserves to have accurate and transparent data from which to evaluate investments that are being made to the program.

Getting all the way to zero

According to these recommended goals, Saint Paul will divert 85% of MSW through recycling and composting by 2025. This leaves a small portion of recycling (5%) and composting (5%) remaining in the waste stream, along with other difficult materials to recycle like mattresses, carpet, appliances, and other bulky items. This last step to achieve zero waste requires serious attention to extended producer responsibility (EPR). Currently there is some policy activity around EPR on the state and national levels and we would be happy to share information with you and provide a briefing about this topic. Without producer responsibility we cannot get to zero waste; it is not entirely up to residents to achieve this goal.

We hope this information is helpful and we look forward to the discussion tomorrow. As always, if you have any questions, please feel free to contact me at 651-222-7678.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Brownell", with a stylized, cursive script.

Tim Brownell
CEO

Cc: Saint Paul City Council
Kris Hageman, Bruce Beese, Public Works Department
Anne Hunt, Pa Vang, Office of Mayor Chris Coleman