

June 8, 2009

Minneapolis Planning Commission  
350 South 5th Street, Room 210 City Hall  
Minneapolis, MN 55415-1385

Dear Commissioners Bates, Cohen, Gorecki, Huynh, Luepke-Pier, Motzenbecker, Nordyke, Norkus-Crampton, Schiff, and Tucker:

In an article in the *Star Tribune* last week, it was reported that the Planning Commission is considering an amendment to the conditional use permit for the HERC facility to allow for a 21% increase in the amount of waste that can be burned. This equals approximately 77,000 more tons garbage per year to be burned in Minneapolis as opposed to recycled or composted. We are writing to ask that you deny the amendment to expand garbage incineration at Hennepin Energy Recovery Center and instead show your support for proven waste reduction strategies like recycling and composting which are seriously hampered by incineration.

The groups signed on below strongly support policy opposing the expansion of incineration capacity. Several signers have been closely involved in the Minnesota Climate Change Advisory Group and have been part of the current MPCA-led stakeholder process to make recommendations to the Minnesota Legislature on the best methods to achieve the state greenhouse gas reduction goals. We are also organizations that promote and provide jobs and economic development through true green environmental initiatives. The signers are joined by many local and national organizations in this position but, due to the timeframe, we were unable to get this letter through their internal process for their support.

For that reason, our first request is that the timeline for review and public comment of this issue be expanded to allow for a fair hearing of the issues and potential alternatives.

Our ultimate request is that we take this opportunity to work together to find ways to create even more economic prosperity while protecting the environment by working together to develop alternatives to burying or burning any garbage.

**Incinerators and landfills are sources of greenhouse gas emissions and waste is not a renewable resource.** All incineration technologies, including mass-burn, gasification, pyrolysis, plasma arc, refuse-derived fuel and waste-to-energy, emit dioxins and other harmful pollutants into the air, soil and water, despite industry claims that they are "green" technologies.

- On average in the U.S., incinerators emit more carbon dioxide per megawatt-hour than coal-fired, natural-gas-fired, or oil-fired power plants.
- In addition to air and water emissions, incinerators create toxic ash or slag that must then be landfilled. This ash contains heavy metals, dioxins, and other pollutants, making it too toxic to reuse, although these industries often try to do so.
- When trash is burned, incinerators emit carbon dioxide (CO<sub>2</sub>) and nitrous oxide (N<sub>2</sub>O), a greenhouse gas 310 times more powerful in atmospheric warming than carbon dioxide

- Many people believe that throwing food scraps and paper products into a landfill is harmless because they biodegrade. However, most people are surprised to learn that when these materials break down in a landfill, they become powerful contributors to greenhouse gas emissions. Compostable materials such as food waste and paper decompose in an anaerobic environment (without oxygen) in a landfill, producing methane (CH<sub>4</sub>) which has 23-71 times greater heat trapping capabilities than carbon dioxide. Landfills are the single largest direct human source of methane.

**Recycling and composting create more jobs than disposal, and these jobs are green jobs that protect the environment. Furthermore, waste reduction strategies like recycling and composting are cheaper than incineration.**

- For example, the Minnesota Climate Change Advisory Group stakeholder's process revealed that it would cost Minnesota \$26 million/year to compost or \$81 million/year to burn waste.
- Composting also creates four jobs for every one job incineration creates.
- Incineration creates only one job for every ten at a recycling facility.

**Now more than ever, recycling needs your support because of the global economic crisis. All markets, including markets for recycling, are in tough shape. Subsidies for wasting through incineration or landfilling make it more difficult for these important businesses, industries, and community efforts to sustain (let alone increase) the economic benefits Minnesotans have already gained through recycling.**

- According to the Recycling Association of Minnesota, in Minnesota the recycling industry creates 8,700 jobs directly, but it is also responsible indirectly for an additional 19,000 jobs.
- The industry brings in \$93 million in state tax revenue and creates \$3.48 billion in gross estimated economic activity every year.

**Incineration wastes the energy that was used to make products, requiring additional extraction and processing of our national resources to start over, which results in additional greenhouse gas emissions.**

- Every product we use has embedded energy, which is the energy it took to extract, transport, and transform the materials needed to produce the product.
- Incinerators actually *waste* energy. When burning materials that could be reused, recycled, or composted, incinerators destroy the energy-saving potential of putting those materials to better use. Recycling, for instance, saves 3 to 5 times the energy that waste incinerator power plants generate. Incinerators are also net energy *losers* when the embodied energy of the burned materials is taken into account.

**It is possible to significantly reduce our waste, rather than “manage” it through disposal.** Minnesota is a leader in recycling. We currently recycling 2.4 million tons of material every year, but we still incinerate 1.2 million tons and landfill 2.1 million tons.

- There are better ways to deal with our waste. Minnesota's waste composition shows that over 50% of what we still throw in the garbage can be recycled through curbside and other types of collection. An additional 25% of our trash is comprised of food wastes and other materials that could be composted. The last 22% of our waste are

products that have design flaws that can be thoughtfully addressed through extended producer responsibility to prevent all of our waste.

- Composting and recycling are effective ways of reducing our greenhouse gas emissions. For example, well-run composting facilities avoid the generation of greenhouse gases, particularly methane.
- The Minnesota Climate Change Advisory Group (MCCAG), a governor appointed body of public, private, and nonprofit groups, convened in 2007 with the purpose of presenting a climate change mitigation plan to the legislature. They looked at issues across all sectors including waste and set significant, yet achievable goals for waste reduction are:
  - 50% recycling and 10% composting by 2012
  - 60% recycling and 15% composting by 2025.
- In Minnesota, recycling and composting of our municipal solid waste would have the same impact as:
  - Shutting down 20% of our state's coal power plants, or
  - Reducing every car usage in the state by two-thirds, or
  - Using 75% less electricity in Minnesota homes.

**Why haven't we reached these goals yet? Disposal has been subsidized for years, particularly incineration in Minnesota, hiding the real costs of disposal and funneling money to dirty technology.** Funding for incineration directly competes with waste reduction strategies.

- Defining trash as a renewable resource funnels funding away from truly renewable strategies like wind and solar power, and truly clean waste management efforts.
- The government should not subsidize waste-to-energy or landfilling as supposed "renewable" technologies over recycling and composting because the environmental and health benefits for the latter are superior.
- When incinerators are built we commit tons of waste for decades to finance their capitalization and ongoing operations. These tons then cannot go to recycling and composting facilities to finance their capital and ongoing operating costs and result in extraction of more resources from our fragile environment, a downward spiral.

If you have any questions, please contact our lead contacts on this letter, Tim Brownell or Susan Hubbard at Eureka Recycling at (651) 222-7678.

Sincerely,  
Tim Brownell, Eureka Recycling  
Susan Hubbard, Eureka Recycling  
Brenda Platt, Institute for Local Self Reliance  
Felicity Britton, Linden Hills Power and Light  
Karen Clark, Women's Environmental Initiative  
Will Steger, Will Steger Foundation

Sources:

Zero Waste for Zero Warming, GAIA, <http://no-burn.org/downloads/climatestatement.pdf>

Recycling Association of Minnesota, <http://www.recycleminnesota.org/html/ReEd.htm>

Stop Trashing the Climate, Institute for Local Self-Reliance, [www.stoptrashingthecclimate.org](http://www.stoptrashingthecclimate.org)

Recycling, Composting and Greenhouse Gas Reductions in Minnesota, Eureka Recycling, [www.eurekarecycling.org](http://www.eurekarecycling.org)