

February 24, 2020

Madam Chair. Thank you for this opportunity to share the County's experience with Emerald Ash Borer, Brownfields and Recycling efforts. For the record, my name is Ramsey County Commissioner Victoria Reinhardt from District 7.

Emerald Ash Borer in Ramsey County

Emerald Ash Borer, otherwise known as EAB, quite simply will kill all infested ash trees, and all ash trees are susceptible to it. EAB has infested trees in over 20 Minnesota counties, resulting in quarantines being placed on the management of wood resulting from removal of ash trees. Quarantines cannot stop EAB from killing all the ash trees in Minnesota but can slow the spread.

Counties, cities and the state have stepped up to address EAB, and still have a lot of heavy lifting to do. The Minnesota Environmental Quality Board (EQB) approved a report in October 2019, called "Emerald Ash Borer in Minnesota", which identifies treatment, tree removal, reforestation and management of the resulting wood as key response strategies. The report stresses the need for continued statewide planning, coordination and support and indicates the need for inter-agency partners to report to the EQB on a regular basis.

Counties are concerned about Emerald Ash Borer from three perspectives. First, are the costs that local government must pay to treat, remove and replace infested trees, and manage waste wood. Second, the tree canopy in urban and suburban areas is an important part of environmental and public health protection. Third the emergence of EAB and the loss of ash trees is creating significant amounts of wood waste, now and into the future.

The federal government can assist with EAB response in these ways:

1. Expanded research on tree diseases and invasive species, with an emphasis on preventive practices to reduce the incidence and spread of disease and assure the health of the urban and suburban tree canopy.
2. Funding to support the development and deployment of alternative technologies and systems for managing wood waste, such as wood to biofuels.

Brownfields in Ramsey County

As Minnesota's most densely populated, fully built-out county, new development in Ramsey County means redevelopment. Often this means addressing historical environmental issues, including known or potential contaminants that may pose a risk to human health and the environment. Many of Ramsey County's brownfields are located next to existing infrastructure, transit networks and other services, making them especially desirable for redevelopment. Such redevelopment can be a catalyst for additional redevelopment in a community. However, brownfield presence makes these sites more expensive to redevelop than greenfield sites on the urban fringe.

Local Action on Brownfields

Local units of government often take on the burden of clean up for brownfield sites voluntarily, and financial assistance can be critical to bridge the resulting financing gap. Since 2004, Ramsey County

has offered an Environmental Response Fund (ERF) to offset the to offset the additional costs and liabilities associated with redevelopment and to position infill sites for private investment – enabling new jobs, housing, and other community-benefitting uses. The ERF is funded by a mortgage registry and deed tax. The County coordinates its ERF grant funding decisions with state and regional grant programs to maximally leverage these limited resources. However, the demand for ERF grant funds routinely exceeds the funding available.

Environmental Response

Brownfield remediation costs are increasing due to updated health risk standards, as well as additional mitigation required for common issues such as vapor intrusion. At the local level Ramsey County will continue to align and leverage its limited resources with other government agencies.

The federal government can provide support via incentives to reduce the additional costs of brownfield cleanup and redevelopment:

1. Include brownfield restoration and investment within aligned areas, such as transportation, infrastructure, housing, natural resource and energy programs.
2. Ensure adequate funding for the U.S. Environmental Protection Agency (EPA)'s Brownfield grant program. While Ramsey County has not often accessed these funds, it has been a resource for several of our constituent communities. The EPA's Brownfield Grant program is a unique complement to state, regional and local programs in that it does not require a "shovel-ready" project. It can be used to ready sites for redevelopment, particularly in areas where the private market is not as robust.

Federal Action on Recycling

There have been changes in the local, national and international systems that recovers and uses recyclable commodities, but there is not a recycling crisis in Ramsey County. Rather, these changes have created a "new normal" for recycling in Ramsey County. The new normal means that cities and the county need to rethink the structure of local contracts and pricing for recycling services. Ramsey County believes that recycling is a necessary public service and has invested significantly over the past three decades to ensure that recycling services are a key component of the waste management system in the East Metro.

So, what has changed over the past two years in recycling?

- Quality of the recyclables is now the prevailing concern.
- International markets have tightened or closed for various reasons.
- Tighter product specifications have increased costs to recycling processors.
- Federal trade policy has had impacts on some materials.
- Recycling collectors and processors are less willing to take on the risks of the natural "ups" and "downs" in commodities prices.

The bottom line: recycling will cost more. Federal action is needed to assure that recycling remains cost effective and viable. At the local level Ramsey County will continue to work with communities and the recycling industry to adjust services and pricing to make sure collection and processing of recyclables continues.

However, at the federal level we believe several actions are needed. We've provided a handout with recommendations. Three that are of particular note"

1. Product Stewardship/Extended Producer Responsibility/Secondary Materials Management

There needs to be federal leadership on product stewardship with a national reach. All of these affect product design and serve to increase recycling. Costs for managing products at the end of their useful life must be shared, and not lie solely with government.

2. Stronger Federal Support for Domestic Markets

- Development of these markets will reduce transportation-related energy/GHG impacts, reduce shocks from sudden changes by foreign trading partners (China et al) and leverage economic value and business opportunities in the U.S.

- Support could include

- o grants to states/regions or for specific projects,
- o financial incentives to manufacturers (tax, grants, low-cost loans),
- o technical assistance to manufacturers to demonstrate how recycled feedstock can substitute for virgin feedstock, and
- o initiating or more strongly supporting existing forums for matchmaking of stakeholders (recycling processors, trade groups, manufacturers, financiers) to create new or stronger supply streams.

3. Support Modernizing Recycling Processing

The Federal government could provide financial assistance/incentives for development and technological enhancement of basic infrastructure like Material Recovery Facilities (MRFs) to operate more cost-effectively and improve output.

Madam Chair, thank you again for this opportunity to provide suggestions on ways we can partner at the local-federal levels.

Ramsey and Washington Counties – Federal Actions to Support Local Recycling

1. Product Stewardship/Extended Producer Responsibility/Secondary Materials Management

There needs to be federal leadership on product stewardship with a national reach. All of these affect product design and serve to increase recycling.

- The state-by-state approach creates innovation, but many issues need to be addressed on a national level because the design, production, marketing and sales of many products is national (or international, which even more strongly argues for a national approach).
- Design for Recycling needs to have some force of law or rule, not just a voluntary initiative, to simplify the recyclability of products (particularly packaging) and especially to reduce the technical complexity and fractionalization of recycling processing (thereby reducing the cost of recycling).
- A national initiative should not be a race for the bottom, and states should have the ability to go above and beyond federal systems where threats to public health, safety, public budgets, social values and environment warrant.

2. Stronger Federal Support for Domestic Markets

More federal support for state or regional development of end-markets.

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- Support could include
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 - financial incentives to manufacturers (tax, grants, low-cost loans),
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 - initiating or more strongly supporting existing forums for matchmaking of stakeholders (recycling processors, trade groups, manufacturers, financiers) to create new or stronger supply streams.

3. Increase demand for recycled content products

The federal government can play a stronger role in increasing demand for recycled material. Federal procurement guidelines have not kept up with the evolving waste stream and evolving recycled content product market, nor are they driving more private sector innovation to expand use of recycled content feedstock. It is not clear how agencies are accountable to assure actual purchases meet even current guidelines. There could also be more effort directed to states to adopt such guidelines for public purchasing, and set the bar for private entity purchasing as well. You can't fix "inefficiencies" in recycling without creating more demand for recycled content products and pulling recovered material into production.

4. Support Modernizing Recycling Processing

Provide financial assistance/incentives for development and technological enhancement of basic infrastructure like Material Recovery Facilities (MRFs) to operate more cost-effectively and improve output to meet more discerning end market requirements, and also for development of intermediate facilities like PRFs (or more capabilities in MRFs) to refine material streams and increase value and market options. Grants and market development expertise/assistance to states/regions are two tools EPA or others (Commerce?) could use.

5. **Create a more level playing field for recycled v. virgin feedstock**

Review federal policies that subsidize petroleum and fiber extraction and production in ways that make virgin plastic and paper feedstock more economically attractive to manufacturers than recycled feedstock. Look for opportunities to either reduce those subsidies (if it can be done in a meaningful way vis-à-vis the price competitiveness of recycled feedstock), or match those subsidies (or at least the effects of them) to the advantage of recycled feedstock in the waste stream “mining/extraction” and production process. Grant funds to the private sector or to the University of Minnesota, for example, could help with developing technology to address recycling opportunities for new and more complicated packaging.

6. **Measurement Matters and a Sustainable Materials Management Approach**

Recycling efforts have targeted the heaviest portions of the waste stream and success has largely been measured by tons recycled, or percentage of the waste stream recycled by weight. A life-cycle view of products needs to be a driver in prioritizing efforts around waste prevention, reuse, recycling and final management. Recyclability alone should not be the driver. We need to develop consistency at a national, state and local level on indicators and measurement methods so we can better tell the story of what success means and better identify where additional efforts are needed to achieve more meaningful results.