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September 24, 2024

Karen Knuuti, Project Manager, DEP, Bureau of Remediation and Waste Management Maine Department of Environmental Protection 106 Hogan Road, STE 6 Bangor, ME 04401

Subject: Public Comment on Juniper Ridge Landfill Expansion Approval

Dear Ms. Knuuti,

On behalf of ecomaine and our 74 member communities, I appreciate the opportunity to provide comments regarding the proposed expansion of the Juniper Ridge Landfill. As a leader in sustainable waste management, ecomaine strongly believes that the Maine Solid Waste Management Hierarchy should be the guiding framework for any decision on waste infrastructure.

While we understand the necessity of landfill capacity, it is critical that this expansion does not undermine the priority of reducing waste, recycling, food waste recovery, and waste-to-energy (WTE) practices. The landfill should serve as the final resort, rather than a replacement for or deterrent to more sustainable waste management strategies.

The waste hierarchy, which prioritizes waste reduction, reuse, recycling, composting, and waste processing (such as WTE), requires robust incentives to encourage both businesses and municipalities to divert waste from landfills. If the expansion is approved, we urge the DEP to adopt measures that uphold these higher-value waste management solutions. Policies should incentivize recycling programs, composting, and waste diversion from WTE plants, which can be enhanced through better processing and residue management at existing facilities like ecomaine.

In particular, it is vital to ensure that waste-to-energy facilities, which reduce the need for landfilling while generating energy, are not sidelined due to the availability of expanded landfill space. We recommend that the landfill be reserved for waste that cannot be diverted through existing waste reduction, recycling, or WTE processes.

In closing, we hope the expansion is structured in a way that maximizes waste diversion and strengthens Maine's leadership in sustainable waste management. We appreciate the DEP's consideration of these recommendations and look forward to supporting efforts that align with the State's ambitious waste reduction goals.

Sincerely, Jamie Garvin Director of Communications & Public Affairs

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