

Mary Allen

Dear MPCA,

After reviewing your plan for waste management in the 7 county metro, it's clear you are willfully ignoring the waste and climate crisis we're currently in, as well as the real impacts of trash incineration and current science. In recent conversations with the Climate Program Manager for the state of Maine, Nathan Robbins, I've found they are adding both carbon loads from consumption and waste into their climate measurements and benchmarks. When I mentioned we only have a 5% reduction in waste in this plan, it was confusing since we have such an ambitious plan for creating 100% clean energy by 2040. How can we create the transformational structural change necessary to reduce carbon emissions if we're not setting equally ambitious goals at the policy level for reducing waste, and therefore consumption, and therefore carbon.

It is also clear the your plan is using outdated science to create its waste hierarchy. Again in my conversation with Robbins, we talked about how incineration is lower on their on Maine's waste hierarchy. They're specifically looking at reduction the best way to manage waste, the MPCA also names reduction as the highest on the hierarchy, yet provide no policy suggestions on how we approach reduction and still advocate for incineration, and has set itself a tragically low goal of 5% reduction. It's a joke.

It might be good for you to look at Maine's climate plan and how they've developed a framework for waste management while being proactive about integrating a climate lens across all of their policy and infrastructure investment and planning. By maintaining your stance that incineration is still the best option, when the energy no longer even meets the standards of the 100% law, it's clear you're holding onto ideas from the past and refusing to recognize the changes we have to make now if we're going to stay below the 1.5 degrees we need to in order to avoid the worst of the climate crisis.

But let's be frank, we're already feeling those impacts. And as much as you want there to be a magic bullet for waste management through incineration, it's not. The HERC is inefficient at best and a danger to public health at its worst. Burdening a predominately Black community with the emissions from burning trash is a travesty. When incineration was designed it didn't take into account the heavy metals and plastic that would be burned, because those materials weren't used and disposed of at the levels they are now. Please stop burying your head in the sand and recognize that we are living in a different world than when we were fighting landfills. It's a false choice to say it's one or the other. We need policy level changes that help curb consumption and waste in the first place, not just figuring out how you'll handle the tonnage.

Here are my four demands for the waste plan:

The MPCA needs to include 2 scenarios for the shut-down of HERC - by 2025 and by 2030. HERC is 34 years old, already past its life expectancy. The legislature has given direction to the county to shut down HERC. HERC will now count against renewable energy commitments. Its closure is increasingly likely, and accounting for this is necessary and responsible planning.

We have a law that now recognizes the cumulative impacts on people's health when they're exposed

to multiple sources of pollution. The HERC is a huge source of pollution. Like the 100% law, this plan is also ignoring the Cumulative Impact law and it needs to look ahead and recognize how the HERC contributes.

The plan must be far more transparent. It must account for the toxic ash that incinerators generate. It must stop weaponizing and distorting science to force communities to accept a risk even scientists don't fully understand and are actively debating. It must take precautions when it comes to people's health and lives, and acknowledge real impacts.

The 20-year waste reduction goal of 5% is unacceptable. Wealthy areas of the metro, the metro overall, and the United States must reduce waste and consumption significantly. The wealthy consume and waste far more than the poor. Hyperconsumption drives the climate crisis. In line with the United Nations Sustainable Development Goals, set a goal of at least 50% waste reduction by 2030 and 75% or more by 2042, as well as 90% diversion by 2042.

My last comment is for the MPCA in general, as I recently attended a meeting for the cumulative impacts law. Your community engagement is poorly designed and executed. There were no signs outside or directions. There was no help on the website for parking at the site or options for public transportation. The set up was designed to break people up into discrete areas instead of creating a collective conversation. The location was not thoughtful, it should have engaged people living in highly impacted areas or city green zones. It's clear you need to build capacity in how you engage community and I hope you do better in the future.

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