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**National Waste  
& Recycling Association**<sup>SM</sup>

**Memorandum In Opposition**

**An Act to Prohibit Landfill Expansion into  
Wetlands  
LD 2070 (Dill)**

Since 1962, the National Waste & Recycling Association (NWRA) has represented the private-sector waste and recycling services industry across the country. Our member companies are responsible for the collection, processing, recycling, and disposal of solid waste, construction and demolition debris, medical waste, and other regulated materials, and they have invested heavily in infrastructure that protects public health and the environment. In Maine, NWRA members include Waste Management, owner of the Crossroads Landfill in Norridgewock, and Casella, operator of the Juniper Ridge Landfill in Old Town.

On behalf of NWRA, I appreciate the opportunity to submit comments in opposition to LD 2070. While we fully support the protection of Maine's wetlands and natural resources, the proposal before the Committee would effectively eliminate the State's ability to permit landfill expansions under any circumstances, regardless of site-specific conditions, regulatory safeguards, or demonstrated need.

As drafted, LD 2070 would make it nearly impossible to expand existing landfill capacity in Maine, including the proposed expansion of the Juniper Ridge Landfill, which is currently under review by the Department of Environmental Protection. Notably, the same restriction would have prohibited the expansion of the Crossroads Landfill, which was approved in 2022 following a comprehensive permitting process that included significant wetland impacts, mitigation measures, and regulatory oversight.

Beyond its immediate effect on existing facilities, LD 2070 would also severely constrain the State's future options. Maine will require additional disposal capacity well before 2040, and potentially much sooner if the Juniper Ridge expansion is not approved. This bill would significantly limit the State's ability to site or permit a new state-owned landfill, regardless of demonstrated need or environmental protections, creating long-term risk to Maine's waste management system.

Importantly, Maine already has a robust and well-established regulatory framework for protecting wetlands under the Natural Resources Protection Act. That framework requires applicants to avoid wetland impacts where practicable, evaluate alternatives, and minimize impacts to the greatest extent possible when avoidance is not feasible. These standards apply uniformly across all forms of development and ensure that environmental protection is balanced with essential infrastructure needs.

LD 2070 would replace that balanced, science-based permitting process with a categorical prohibition that does not distinguish between responsible, well-regulated projects and inappropriate development. In doing so, it would undermine the State's ability to plan for and manage waste responsibly while providing no additional environmental protection beyond what current law already requires.

For these reasons, NWRA respectfully urges the Committee to oppose LD 2070 and to continue relying on Maine's existing regulatory framework to evaluate landfill projects based on site-specific facts, environmental impacts, and the State's long-term capacity needs.

Thank you for your consideration. I would be pleased to provide additional information or answer any questions.

Sincerely,

**Lewis A. Dubuque**

Lewis A. Dubuque  
Vice President, Chapter Relations  
National Waste & Recycling Association