



August 2, 2019

Ms. Judy-Ann Mitchell
Acting Deputy Division Director
Land, Chemicals and Redevelopment Division, USEPA Region 2
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Dear Ms. Mitchell

NO to New Landfills Unless Municipal Composting is Instituted

I'm writing today as President of Island Green Living, a nonprofit on St. John, former Chairman of the Governor's Recycling Task Force, Hurricane Debris Management Team, co-author of an alternative plan to handle debris vs burning (ACI), former Chairman of the Waste Management Authority and as a St. John resident, in strong opposition to the US Virgin Island's RCRA Subtitle D MSWLF Permit Program.

In addition I understand the need to give oversight authority to the DPNR. This should be granted only if DPNR personnel are not part of the WMA board of directors as it would cause a conflict of interest.

It is unconscionable that the USVI proposes continuing to cram our landfills – and indeed create new ones – with items that are recyclable and compostable and could be used as a resource for our island community. We are small Caribbean islands and given our limited landmass, we are much more vulnerable than mainland USA. How we handle our "waste" is critical to our very existence.

While I have been advocating for municipal recycling programs including glass, aluminum, etc. for years, at the very least the territory must initiate municipal level mulching/composting to recapture as much 60% of VI's waste stream that is compostable - such as green and brown material. Mulch and compost can then be used by the community, public works, farms and local businesses. This is low-hanging fruit and the least expensive way to help alleviate the overwhelming burden facing our waste management system. Additionally there needs to be investment in sustainable education K-12 as well as vocational job development.

What has worked well and been successful in other locations is the following three-pronged composting strategy implemented all at the same time:

- more -

- Legislation banning compostable materials from the landfills, and requiring composting of this material
- Investment in infrastructure for centralized composting locations (one or more on each island)
- Encouragement (education) of on-site composting, particularly at large institutions like hotels, resorts, and parks

In 2011, the VI Recycling Partnership (VIRP) conducted a detailed study and put together an *Integrated Solid Waste Management Strategy* document (copy attached).

The VIRP was co-founded EPA Region 2 and Mark Lichtenstein, Chief of Staff and Chief Sustainability Officer, State University of New York, College of Environmental Science and Forestry facilitated the VIRP and the development of the *Strategy*.

It includes input from many VI residents, members of the VIWMA, UVI representatives, and others from a number of organizations in the VI and on the mainland. Doug White, Dr. Gary Ray, Dr. Dave Minner, and Sue Parten from Island Green Living were actively involved. The document includes elements of successful programs and initiatives from many other communities. While it is eight years old and there are sections that need updating, it should still be seen as a seminal document and roadmap. Many hours of work went into this and it provides valuable research and insight.

Additionally, after the hurricanes in 2017, a detailed *Debris Management Plan* was put together with the objective of managing the glut of vegetative debris on our islands created by the storms and providing a blueprint for municipal composting going forward. The plan is attached.

NOW is the time to put a sustainable plan for waste management into action. We can't afford to continue to go down the road we are on. Please say NO to new landfills without municipal composting. Unfortunately past history demonstrates that our Waste Management Authority does not have the know-how or the will. As the Chairman of the Board, we gave directives and the then ED did not deliver results.

Once we start mulching, composting and recycling, we will reduce our waste and will realize most is a resource rather than waste. Yes – with full blown composting in operation, I would support a new small landfill.

Thank you for your time.

Sincerely,

Harith Wickrema

President

Island Green Living

Chief Visionary Officer

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