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To: [Knuuti, Karen](#)
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Subject: Public Comment on Behalf of Friends of Harriet L. Hartley in Solidarity with the Penobscot Nation and Conservation Law Foundation
Date: Tuesday, September 3, 2024 8:57:42 AM
Attachments: [HLH Statement to DEP Re Juniper Ridge Landfill.pdf](#)

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Good morning,

I hope this message finds you well. On behalf of the Friends of the Harriet L. Hartley Conservation Area (HLH), I am writing to submit the attached public comment regarding the proposed expansion of the Juniper Ridge Landfill (JRL). Please find the letter attached, in which the President expresses the Board's support for the concerns and recommendations outlined by the Penobscot Nation and the Conservation Law Foundation in their joint letter dated July 31, 2024.

We appreciate your attention to this matter and urge you to consider the points raised in our letter as part of the public record.

Thank you for your time and consideration.

Sincerely,

Parker Richardson

Communications Specialist

Friends of Harriet L. Hartley



September 2, 2024

RE: Proposed expansion of the Juniper Ridge Landfill

Dear Ms. Knuuti:

I write on behalf of the Board of Directors for the Friends of the Harriet L. Hartley Conservation Area (HLH). Please consider our comments on the proposed expansion of the Juniper Ridge Landfill (JRL) and enter them in the public record.

The HLH Directors support the arguments made by the Penobscot Nation and the Conservation Law Foundation (CLF) in their joint letter of July 31, 2024. After a careful review of the facts surrounding Casella Waste System's expansion request, we submit that the pollution control, "public benefit," and "environmental justice" criteria required by the application process can only be satisfied if the following conditions are met.

- 1) Stop new discharges of PFAS. Any leachate from JRL must be treated in a system that is proven to reduce concentration of PFAS to a level that protects the public health and the biodiversity of the receiving waters.
- 2) Stop accepting waste Massachusetts will not treat itself. In order to extend the life of JRL, Casella must present a plan that significantly reduces the volume of Construction & Demolition Debris (CDD) it accepts from out-of-state sources. This will reduce the likelihood that waste flows from the landfill contain the toxic contaminants so pervasive in this type of bulking material. Other in-state sources of appropriate bulking materials must be found or developed.
- 3) Do not ignore Maine's reduction and recycling goals. The current Casella proposal must be amended to satisfy Maine's Solid Waste Hierarchy, one that wisely mandates waste reduction, diversion, and recycling. Continued failure to meet the statutory reduction and recycling goals in 38 M.R.S.A. Sec. 2132 is unacceptable.
- 4) Do not set a low bar for "meaningful involvement." As DEP requirements now include "environmental justice" in determinations of the "Public Benefit," it is especially important that the Department set a high standard for Public Benefit...one that includes the concept of "meaningful involvement" proposed by CLF and the Penobscot Nation. We cannot say it any clearer than you find it in their July 31st letter.

"The intention of the 'meaningful involvement' provision can only be interpreted as requiring the project proponents to do more than just the basic legal requirements and to be intentional with their community engagement efforts. If 'meaningful involvement' equated to 'business as usual' by a project proponent fulfilling the basic legal requirements, then the EJ provision would not have been necessary to pass into law..."

[Source: Conservation Law Foundation & Penobscot Nation. Letter to Maine DEP; July 31, 2024. Pages 12-13.]

Solid waste reduction, reuse, and recycling are now unavoidable if human society is going to recognize and protect the interconnected nature of our communities. As a species, humanity must honor and protect the Web of Life in which we exist...and in which we will only thrive if we live in harmony with the rest of the natural world. Don't let the potential expansion of Juniper Ridge Landfill dig us — literally — into a deeper hole of degradation!

Respectfully submitted,
Sidney Block, MD
President, Friends of Harriet L. Hartley Conservation Area

Friends of Harriet L Hartley Conservation Area is a 501(c)(3) non-profit organization.
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