



Maine Department of Environmental Protection  
Attn: Karen Knuuti  
DEP 106 Hogan STE 6  
Bangor, Maine  
04401

September 24, 2024

RE: Public Comments in opposition to Draft Departmental Order for the expansion of the  
Juniper Ridge Landfill

Ms. Knuuti,

We are the core staff of First Light, a collective effort across 60+ non-native conservation organizations working in what's now called Maine to return land, access, and financial resources to Wabanaki people. We work very closely with the Wabanaki Commission on Land and Stewardship, an intertribal body that creates space for Wabanaki diplomacy and directs our community's efforts to return. Much of the work of First Light is supported by a collective effort of relearning in the non-native, conservation community, seeing the ways our current conservation practices are connected to settler-colonial mindsets and seeking ways forward that return decision-making and authority to Wabanaki people.

As core staff, this comment reflects our combined individual experience and relationships with Wabanaki partners.

We appreciate the opportunity that the Department has offered for public comment on its draft decision to approve with conditions the expansion of the Juniper Ridge landfill. We believe that the department should reverse that approval and deny the permit in its final order.

Since time immemorial, and demonstrated today by leadership on the restoration of the Penobscot River and its watershed, the Penobscot Nation and Wabanaki people have protected and cared for the Penobscot River creating a healthy, thriving place for all of us who now call Maine home. We strongly support their leadership in opposing this expansion. We think Ambassador Maulian Bryant says it best: *"The health and well-being of the River has a direct*

*and absolute effect on the health and well-being of our Tribal citizens.. ..the expansion of Juniper Ridge under Casella perpetuates harms against the Penobscot Nation, who are the original stewards of these lands and waters dating back over 10,000 years. We add our voice to the assertion that there is no public benefit to this expansion, quite the opposite.”*

The expansion of JRL requires a demonstration that the action “is not inconsistent with ensuring environmental justice for the community in which the facility or expansion is proposed”. Given the damages to place and people of landfill leachate and pollution, and the opposition from the Penobscot Nation, it is clear that expansion would not ensure environmental justice, and cannot move forward in accordance with state policy.

Thank you for this opportunity and the work of the Department in protecting our environment.

First Light Core staff,

Otto Muller, Peter Forbes, Ellie Oldach, and Brett Ciccotelli