



July 5, 2024

Via Electronic Mail: [Melanie.Loyzim@maine.gov](mailto:Melanie.Loyzim@maine.gov), [karen.knuuti@maine.gov](mailto:karen.knuuti@maine.gov)

**Melanie Loyzim**

Commissioner  
Maine Department of Environmental Protection  
17 State House Station  
32 Blossom Lane  
Augusta, Maine 04333-0017

**Karen Knuuti**

Environmental Specialist, Bureau of Remediation and Waste Management  
Maine Department of Environmental Protection  
106 Hogan Road, Suite 6  
Bangor, Maine 04401

**Re: Request for a Virtual Public Comment Opportunity for the Public Meetings on July 16, 2024 for the Public Benefit Determination Application for Juniper Ridge Landfill (DEP# S-020700-W5-CV-N)**

Dear Commissioner Loyzim & Specialist Knuuti:

Pursuant to 38 M.R.S. § 1310-AA(2), the Maine Department of Environmental Protection (“MEDEP”) is hosting in-person public meetings for the public to comment on the Public Benefit Determination Application (“PBD”) for Juniper Ridge Landfill (“JRL”) (DEP# S-020700-W5-CV-N).<sup>1</sup> The meetings will take place on July 16, 2024, from 1:00 to 3:00 pm and 5:30 to 7:30 pm at the Wells Conference Center, located at the University of Maine, 131 Munson Road, Orono, Maine. MEDEP has stated that there will be an opportunity for the public to attend these meetings virtually, but without the opportunity to provide comment. We write this letter to request that MEDEP provide virtual attendees with the ability and option to provide oral comments.

Conservation Law Foundation (“CLF”) protects New England’s environment for the benefit of all people and uses the law, science, and the market to create solutions that preserve our natural resources, build healthy communities, and sustain a vibrant economy. Through its

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<sup>1</sup> *Juniper Ridge Landfill*, ME DEP’T OF ENV’T PROT., <https://www.maine.gov/dep/waste/juniperridge/> (last visited July 5, 2024); *Public Meeting on Public Benefit Determination Application for Juniper Ridge Landfill*, ME DEP’T OF ENV’T PROT. (2024), available at <https://www.maine.gov/dep/ftp/Juniper-Ridge/PBD2024/JRL%20PBD%20public%20meeting%20notice.pdf>.



Zero Waste Project, CLF aims to protect communities from the dangers posed by unsustainable waste management practices.

The JRL PBD application is of significant interest to many members of the community and state. Even though MEDEP is currently accepting written comments on the application, many members of the community have a strong desire to have their voices heard at MEDEP's public meetings. However, there are various circumstances and hurdles (e.g., health, financial, geographic location, etc.) that certain members of the community, particularly those in environmental justice communities, face that inhibit their ability to attend the meetings in-person.

The relevant Maine statute governing a PBD defines "environmental justice" as "includ[ing] the equal protection and *meaningful involvement of all people* with respect to the development, implementation and enforcement of waste management laws, rules, regulations and licensing decisions."<sup>2</sup> CLF believes that the "meaningful involvement of all people" includes the ability for the community to provide virtual comments at the July 16<sup>th</sup> meetings. Such an option is entirely consistent with other government proceedings within the state and around the New England region that have offered this option. Doing so is not technically difficult and will allow the meetings to be accessible to many and fulfill the spirit of what "meaningful involvement of all people" means.

Thank you for your consideration of this request. Please do not hesitate to contact us and direct any questions to Alexandra St. Pierre ([aestpierre@clf.org](mailto:aestpierre@clf.org)) and/or Suhasini Ghosh ([sghosh@clf.org](mailto:sghosh@clf.org)).

Sincerely,

**Alexandra St. Pierre**  
*Director of Communities & Toxics*  
*Conservation Law Foundation*

**Suhasini Ghosh**  
*Staff Attorney, Environmental Justice Program*  
*Conservation Law Foundation*

cc: **Sean Mahoney**  
*Vice President, Maine & Senior Counsel*  
*Conservation Law Foundation*

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<sup>2</sup> 38 M.R.S. § 1310-AA(3)(E) (emphasis added).