As a part of the Finger Lakes Community, permitting New York's Largest landfill to continue operating and expanding beyond its set closure date of 2025 is in conflict with our region's community character, and poses many risks to our environment; our air, water, the climate, our agri-tourism related economy, our rural roads and way of life - *and* how we define the Finger Lakes' rich heritage. For more background, please consider:

The Seneca Meadows landfill, located in Seneca Falls, the birthplace of American Women's Rights, is the largest of 27 landfills in New York State. It is permitted to accept 6,000 tons of waste and produces up to 200,000 gallons of polluted leachate – formed when rainwater filters through waste, picking up contaminants,– per day. According to its 2022 annual report, 30% of waste accepted is trash from NYC, followed by 16% from four other states.

Seneca Meadows was slated to close in 2025, but now, Waste Connections – the landfill's Texas-based, for profit operator – has applied with the DEC to expand their footprint by another 47 acres and seven stories (70 feet), and extend their operation through 2040. Seneca Meadows already stands at nearly 30 stories tall (280) feet. The expansion would make this mountain of garbage taller than the tallest building in the nearest city of Syracuse– or taller than the Statue of Liberty, including its pedestal.

Many people ask, "If we close the landfill, where will all of the garbage go?" That is the question that the landfill would like you to ask. But it's the wrong question. The question is, how do we go from a throw away culture to a zero waste system that benefits communities, the environment, the climate, and the economy? The answer is clear. Read more here: https://just-zero.org/our-stories/explainer/false-choice-in-the-way-of-zero-waste/

We support policy that creates good jobs, cleans our communities and fights climate change, and a zero waste system is the solution.

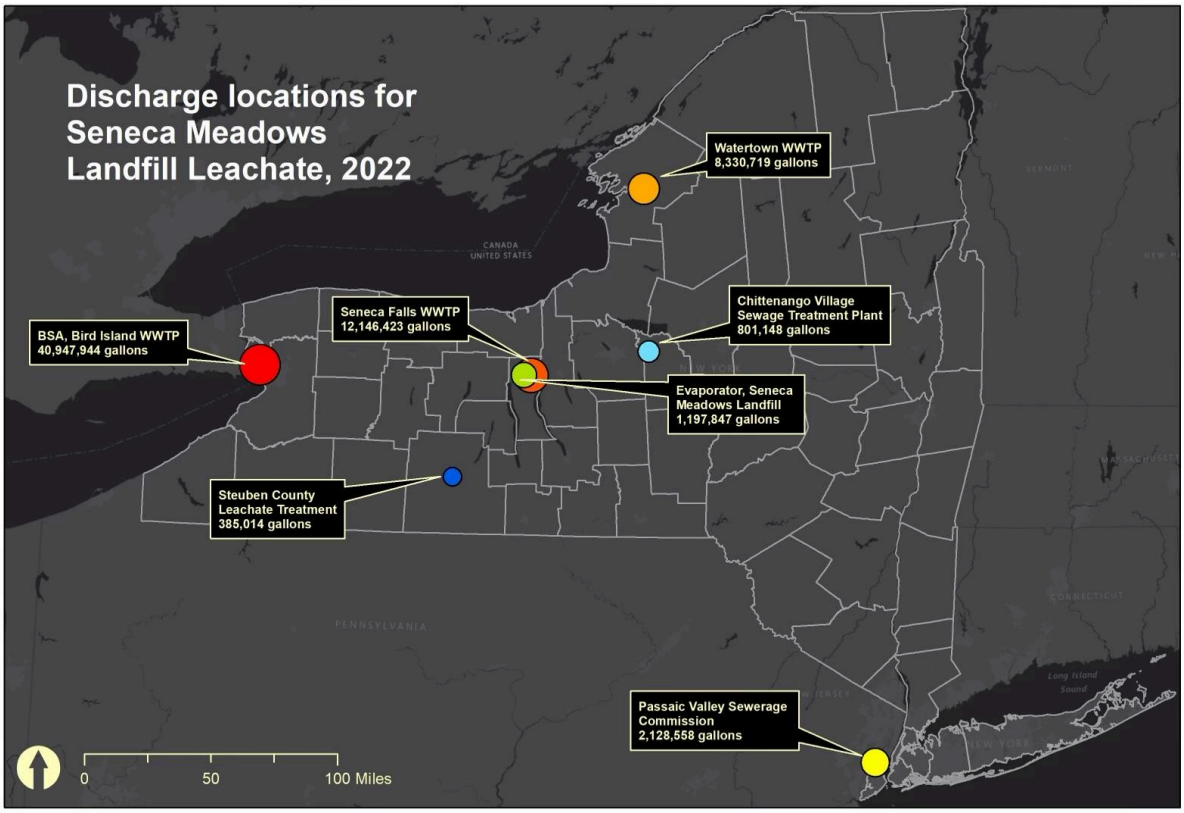
In contrast, the proposed expansion would make *more* room for more garbage with allowable dumping on the Valley Infill (the former toxic Tantalo superfund site), at a time when the state is promoting a zero waste system including robust reduction of waste, better recycling programs, and using landfills *as a last resort*. Even with the planned closure in 2025, the existing mountain of garbage promises years of problems and remediation that could take generations to mitigate, but the impacts will lessen in time.

Supporting the closure of SMI by 2025 is a win-win, and does not have to mean that the waste currently received there will become a burden on another community. In December of 2023, DEC Released its Final New York State Solid Waste Management Plan, which guides State and Local Actions to Prioritize a Circular Economy to Promote Reuse, Prevent Landfilling, and Reduce Emissions that Cause Climate Change.

DEC announced the finalization of the 2023-2032 New York State Solid Waste Management Plan, a milestone in the State's ongoing efforts to ensure New York is at the forefront of rethinking waste. The *New York State Solid Waste Management Plan: Building the Circular Economy through Sustainable Materials Management* is a 10-year plan that describes actions to reduce the climate impact of solid waste and provides direction for New York's waste reduction, reuse, recycling, collection, transportation, and disposal investments, policies, and practices over the next decade. Increasing our landfilling capacity **completely contradicts** these goals.

Leachate and wastewater runoff from the landfill contain the forever chemicals per- and polyfluoroalkyl substances (PFAS), which can cause widespread contamination of drinking water and harmful health impacts including cancer. Seneca Meadows hauls millions of gallons of its PFAS-laden leachate to Buffalo, Watertown, Chittenango, and Steuben County. These localities don't have the technology to filter out the PFAS before it goes into their waterways and drinking water sources.

There are no federal or state regulations currently requiring PFAS disclosures from all facilities that might be discharging it. The "PFAS Surface Water Discharge Disclosure Act" – introduced by Assemblymember Kelles and Senator May – would require annual testing for all facilities permitted to discharge water. A recent Rockefeller Institute policy brief showed that New York is one of nine states that falls well short of the EPA guidance on enforceable drinking water standards for PFAS.



Are we a World-Class Tourist Destination, or The Garbage Capital for New York? We can't be both. According to the DEC, "Of the nine regions in NYS, Region 8 has the highest tonnage of waste imports. The most significant portion of waste imported to Region 8 was Municipal Solid Waste (MSW), which accounted for 69 percent of imported waste from other regions in NYS and from other states. About 51 percent of waste imported to Region 8 went to Seneca County for disposal at a landfill."

SMI is harming the Finger Lakes' natural resources that have led to the region being under consideration for a National Heritage Area Designation, and which the $3 billion, 60,000-employee wine and agritourism economy relies on. The odor from the landfill can be smelled from miles away, including at Thruway exit 41, the northern gateway to the Finger Lakes.

Large, sustainable employers in the area are finding it difficult to recruit and retain employees, because nobody wants to raise a family near a dangerous landfill.While tax revenue is up for most of the FLX counties in July, year over year from '22 to '23, averaging almost 12%, it's actually ***down* by -2.5% in Seneca County**, home to Seneca Meadows Landfill. We believe this

is a trend that nobody wants to see spread or continue throughout the Finger Lakes -all for the sake of a Texas-based waste corporation's profit.

Areas surrounding the landfill have been labeled Disadvantaged Communities. In the past, waste management and tourism both accounted for steady shares of Seneca County's GDP. Now, all accommodation and food service jobs have vanished within a 2 km radius around the landfill, the bulk of which were lost the last time the landfill expanded. Seneca County is alone among its five neighboring counties in failing to rebound post pandemic, presumably because it is home to New York State's largest, tallest landfill.

Housing surrounding the landfill is characterized by weak demand, high rates of poverty, lack of job growth, and a vacancy rate that increased nearly sevenfold in the last decade.

The landfill poses serious risks to public and environmental health and safety, making it at odds with the overwhelmingly popular amendment to the New York state constitution passed last year, which guarantees every New Yorker the right to clean air, clean water, and a healthful environment.

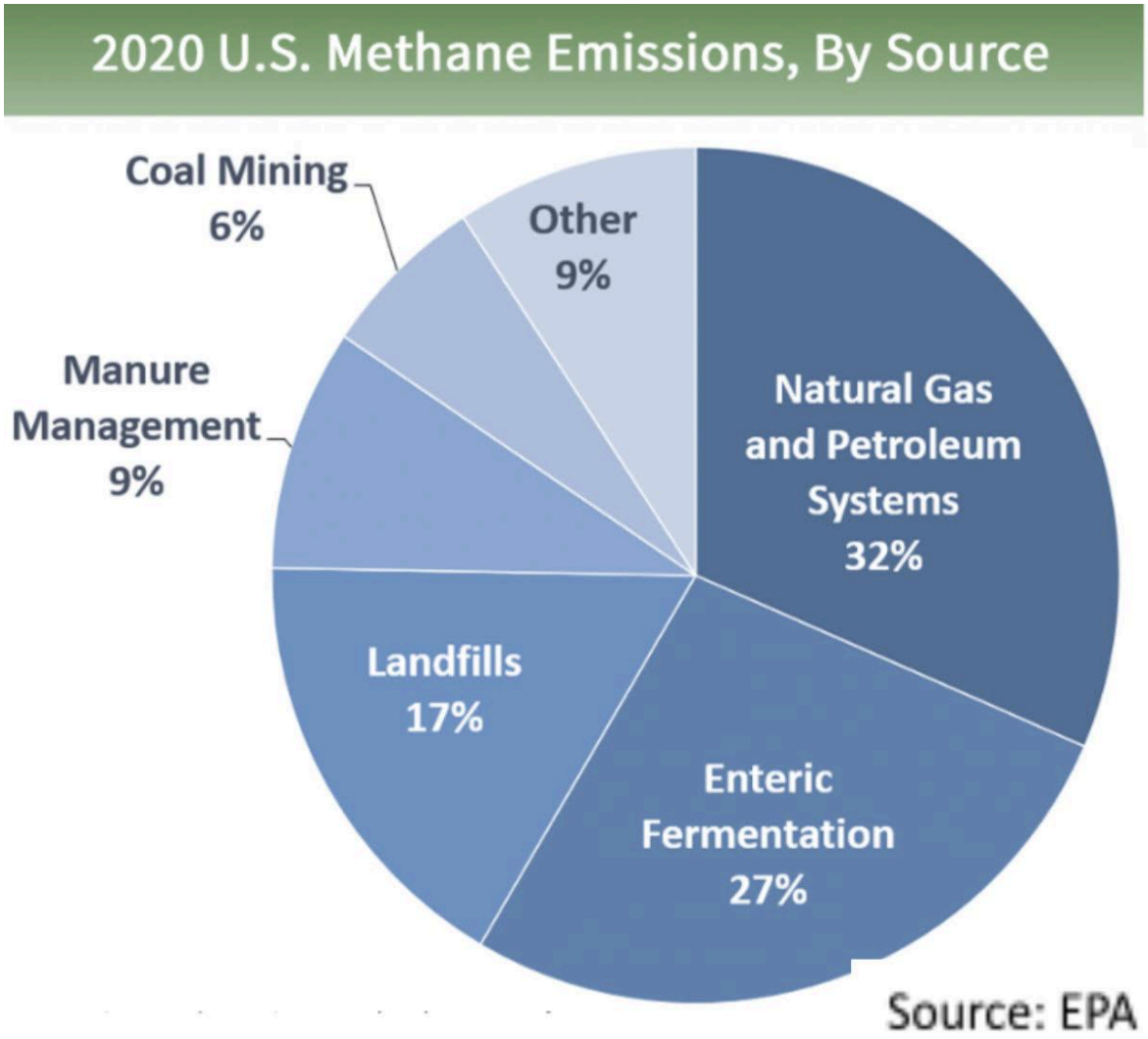
Seneca County's public health is ranked 48th out of 62 counties. After SMI's last expansion, premature death in Seneca County began to far outpace state and national averages. The leading causes of premature death are malignant tumors, heart disease, and chronic lower respiratory disease. These health conditions have been shown to have systematic links to ongoing landfill exposure. The area around Seneca Meadows is in the 98th percentile in New York State for persons having one or more disabilities, in the 90th percentile for emergency department visits for COPD, and it has elevated rates of low birth weight deliveries.

SMI is located two miles from the Cayuga-Seneca Canal and three miles from every school in Seneca Falls and Waterloo, potentially exposing students to airborne particulates and unseen gasses known to contribute to respiratory illness, asthma, and migraine headaches. The landfill cannot process all of the methane that is generated and is forced to burn almost a billion cubic feet per year in 5 flares, contributing to climate change.

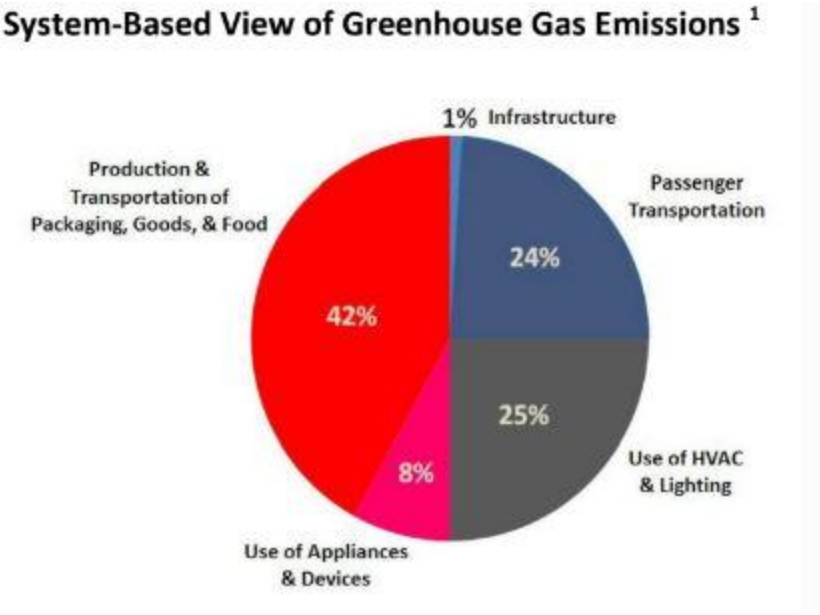
DEC Commissioner Basil Seggos recently tweeted about his agency's intentions to "better serve disadvantaged communities all across New York," which should include SMI.

SMI's expansion is also at odds with the overwhelmingly popular environmental rights amendment to the New York state constitution passed last year, which guarantees every New Yorker the right to clean air, clean water, and a healthful environment. Lung cancer rates were particularly high across a band of census tracts that include Waterloo, Seneca Falls and Seneca Meadows Inc., where the landfill straddles the two towns, according to Department Of Health (DOH) statistics for 2011 through 2017. Despite efforts to obtain more recent tracking, DOH is "suppressing" (their words) that specific data and now only supplies county-wide data, which dilutes the numbers by spreading it throughout the entire county versus smaller more detailed tracts, and in our view, allows big polluters like SMI to hide within that more broad analysis. In the Emissions Inventory from SMI's website, many of the *fugitive* Hazardous Air Pollutants (HAPS) summarized in Table 3 are compounds that are known human carcinogens. Some of the highest levels are compounds like benzene, toluene, ethyl benzene, xylene, dimethyl benzene and many more. In addition to fugitive emissions, more of these same compounds are released to the atmosphere as byproducts of incomplete combustion from flaring.

The landfill is hindering New York from achieving the goals of New York's bold Climate Law. Seneca Meadows produces roughly 16.94 ***billion*** cubic feet of fugitive emissions including 355,671 metric tonnes of methane every year- a greenhouse gas more than 80 times more potent than carbon dioxide. New York's waste sector accounts for 12 percent of our state's greenhouse gas emissions, and 17% of U.S. methane emissions.



Sustainable materials management is good for New York, communities, the environment, and the economy. Overall, the production, transportation and use of consumer goods, packaging and food are responsible for approximately 50% of all global greenhouse gas emissions to our atmosphere. The 50% of this carbon emitted to the atmosphere can be reduced by programs, legislation and incentives that reduce generation of goods, packaging and food and increase re-use, recycling and composting rates. These are known collectively as zero waste systems.



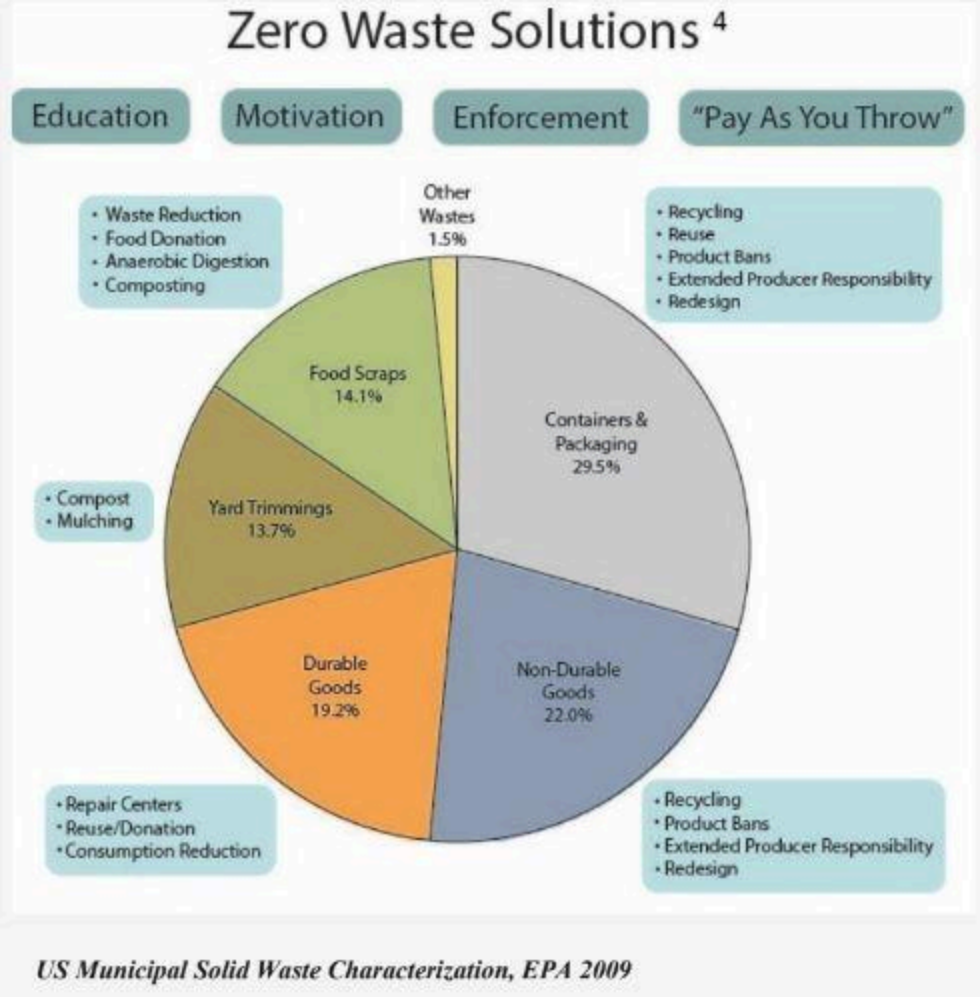
[Zero Waste programs can create jobs] in our communities—whether we're in a large or small, urban or rural area. And, Zero Waste programs strengthen our economy by keeping dollars and materials circulating through our region. Programs that reuse, repair, recycle, and compost materials create more jobs than landfills and incinerators per ton of materials handled:

- Recycling creates an average of nine times more jobs than trash
- Composting creates at least twice as many jobs as landfills and four times as many jobs as incineration facilities.
- Reuse creates as many as 30 times more jobs than landfills.

On a national level, the US recycling industry generates $117 billion in economic activity annually. According to the EPA's 2020 Recycling Economic Information (REI) Report, recycling and reuse activities in the United States accounted for:

- 681,000 jobs;
- $37.8 billion in wages; and
- $5.5 billion in tax revenues

This equates to 1.17 jobs for every 1,000 tons of materials recycled. In the Finger Lakes, where our driving economic engine is agriculture and tourism that supports 60,000 jobs and generates $3 Billion in annual state revenue, not only would these jobs be more consistent with our community character, but closing SMI and moving toward this system would also help more sustainable businesses that are already established be able to recruit and retain employees who otherwise pass on jobs that would mean raising a family near an expanding landfill.



US Municipal Solid Waste Characterization, EPA 2009

It is time for this landfill to close, and for New York to implement more sustainable waste management practices that would generate far more jobs than the landfill does. Any Solid Waste Management Plan adopted by the state would be worth less than the paper it's written on if it allows the state's largest landfill to expand and continue operating through 2040.

In order for New York to adequately address recycling policy and producer responsibility, fight climate change, and combat our waste crisis, it is essential that we start with the state's largest landfill as a gesture that our state's Solid Waste Management Plan is genuine and its goals are adequately addressed.