



744 Broadway  
Albany, NY 12207  
518-426-9144  
[www.newyork.sierraclub.org](http://www.newyork.sierraclub.org)

Ms. Kim Merchant  
NYS DEC - Region 8 Office  
Division of Environmental Permits  
6274 East Avon-Lima Road  
Avon, NY 14414

October 10, 2021

Dear Ms. Merchant,

I write today on behalf of the nearly 45,000 members of the Atlantic Chapter of the Sierra Club to request an indefinite extension, plus 30 days, in the scoping process for the Hakes Landfill expansion SEQRA process announced in the September 15, 2021 Environmental Bulletin.

According to the newly adopted streamlined SEQRA process, scoping comments are made on completed applications, not theoretical concepts. Although the scoping documents claim on page 8 in Section 1.3, that Part 360 applications have been submitted, no evidence of their existence can be found. No applications are posted on <https://hakesexpansion.blogspot.com/>, nor have FOIL requests managed to produce these documents the day after the ENB notice.

I also understand that the Town of Campbell has yet to receive an application to close Manning Ridge Road.

Under these circumstances, it is not possible to make informed comments on the adequacy of the draft scope, in fact, it would be foolhardy, given that only issues raised in scoping can be considered later on as the project moves forward. Therefore I reiterate my request for indefinite extension, plus 30 days of the comment period until the public has had an opportunity to review, study and comment on the missing application materials.

A handwritten signature in cursive script that reads "Kate Bartholomew".

Kate Bartholomew, Chair  
Sierra Club Atlantic Chapter  
607-228-7371

cc

Debbie Heaton  
Scott Elkins  
Jack Darin  
Hop Hopkins  
Kristal Ibarra-Rodriguez  
Marion Klaus  
Kady McFadden  
Mark Walters  
Lucy Mayo  
Loren Blackford  
CCL; CCR