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November 18, 2022

**PRIORITY MAIL**

Yvonne Taylor  
Seneca Lake Guardian  
PO Box 333  
Watkins Glen NY 14981

Joseph Campbell  
Seneca Lake Guardian  
PO Box 333  
Watkins Glen NY 14981

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PO Box 333  
Watkins Glen NY 14981

Re: Cease and Desist Notice for False and Defamatory Statements by Seneca Lake Guardian

Dear Ms. Taylor, Mr. Campbell, and Seneca Lake Guardian:

Our firm represents Seneca Meadows, Inc. ("Seneca Meadows"), the owner and operator of the Seneca Meadows Landfill in Seneca Falls and Waterloo, New York. This letter addresses and provides documentation of the false and defamatory statements that Seneca Lake Guardian and Yvonne Taylor have made and repeated about Seneca Meadows and the Landfill across multiple forums, including Seneca Lake Guardian's website. As founders and principals of Seneca Lake Guardian, Ms. Taylor and Joseph Campbell are responsible for those statements. We write to demand the removal of these wrongful statements from online media and the cessation of further defamatory conduct.

As you are aware, Seneca Meadows Landfill is a municipal solid waste landfill that provides critical waste management and disposal services to residents, businesses, and municipalities. The New York State Department of Environmental Conservation ("NYSDEC") monitors and closely regulates the Landfill, including having a fulltime employee at the Landfill. Seneca Meadows has invested millions of dollars in minimizing the potential for offsite impacts from the Landfill. Seneca Meadows also produces renewable energy by maintaining state-of-the-art gas collection and control and gas-to-energy systems.

For decades, Seneca Meadows has been a strong and valuable member of the Waterloo and Seneca Falls communities. It provides over \$5 million annually to Seneca Falls and Waterloo in host fees and free local waste disposal services. In 2019, Seneca Meadows provided over \$7 million in annual payroll to its over 60 employees, and its operations generated over \$62 million in payments to businesses and vendors. The company supports and donates to numerous local organizations and good causes; these efforts include contributing to student scholarships and educational grants, supporting the annual Christmas Promise bicycle giveaway, and establishing and maintaining the Seneca Meadows Wetlands Preserve—a seven-mile network of trails through forested land and other wildlife habitat, which is open to the public free of charge.

Despite these known and well-documented efforts, Seneca Lake Guardian has engaged in baseless fearmongering regarding the Seneca Meadows Landfill, repeatedly making false statements about the facility's impacts on the local community and other defamatory statements. Publications that contain these statements include:

- Seneca Lake Guardian's "Garbage Landfill" webpage presents unfounded statements about the Seneca Meadows Landfill as facts: <https://senecalakeguardian.org/Garbage-Landfills>
- readMedia publications where Seneca Lake Guardian repackages false and misleading statements (including those made by Ms. Taylor) about the Seneca Meadows Landfill:
  - May, 23, 2022: <http://readme.readmedia.com/Seneca-Lake-Guardian-Responds-to-Gov-Hochul-Finger-Lakes-Workforce-Development-Announcement/18592074>
  - July 18, 2022: <http://readme.readmedia.com/FACT-SHEET-Seneca-Meadows-Landfill-Poisoning-Drinking-Water-Across-New-York-State/18821785>
  - July 20, 2022: <http://readme.readmedia.com/SLG-Testifies-on-DEC-Regs-States-Largest-Landfill-Must-Be-Included-in-Prohibition-on-Expansion/18823197>
  - August 26, 2022: <http://readme.readmedia.com/SLG-Calls-on-First-Female-Gov-to-Shut-Down-Landfill-Dumping-on-the-Birthplace-of-Womens-Rights/18879889>
  - August 29, 2022: <http://readme.readmedia.com/SLG-600-Signatories-Earthjustice-to-DEC-NYs-Largest-Landfill-Must-Be-Included-in-Prohibition/18881824>



In each instance bulleted above, the readMedia post identifies a contact at Pythia Public, an entity that is understood to provide public relations assistance, media support and other services to its clients. Pythia Public apparently is providing active support to Seneca Lake Guardian including assistance on posting false and misleading statements about Seneca Meadows on the readMedia platform. We have copied Pythia Public's listed founders, Evan Thies and Alexis Grenell, on this letter.

- A July 19, 2022 GeneseeSun.com article, called "Seneca Lake Guardian Claims Seneca Meadows Landfill is Poisoning Drinking Water," includes defamatory statements by Yvonne Taylor: <https://geneseesun.com/seneca-lake-guardian-claims-seneca-meadows-landfill-is-poisoning-drinking-water/>

Seneca Meadows welcomes input from the community and seeks to engage productively with local residents and organizations to address concerns. Yet Seneca Lake Guardian has chosen a different path—publishing unfounded statements about the Seneca Meadows Landfill on its website, through readMedia, and via other forums in furtherance of its apparent mission to unfairly tarnish the Landfill. These disparaging claims about contamination, health effects, violations of legal obligations, and other Landfill impacts—which have no basis in fact and are contrary to objective evidence—are wrong and harmful to Seneca Meadows and its employees.

Seneca Lake Guardian's opposition to the Seneca Meadows Landfill is not the issue, and Seneca Meadows respects its right to argue for that position, however misguided it may be. But, in advocating for its cause, Seneca Lake Guardian must cease making and remove its defamatory statements from its website and other platforms.

#### **I. False claims about health effects of emissions.**

Among other claims, Seneca Lake Guardian has published the following statements asserting that emissions from the Seneca Meadow Landfill are causing or contributing to adverse health impacts to the community:

- "The landfill . . . exposes local residents to airborne particulates and unseen gasses that are known to contribute to respiratory illness, asthma, and migraine headaches."
- "[The Landfill] is located two miles from Cayuga-Seneca Canal and three miles from every school in Seneca Falls and Waterloo, exposing students to airborne particulates and unseen gasses known to contribute to respiratory illness, asthma, and migraine headaches."<sup>1</sup>

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<sup>1</sup> <http://readme.readmedia.com/SLG-600-Signatories-Earthjustice-to-DEC-NYs-Largest-Landfill-Must-Be-Included-in-Prohibition/18881824>.

Objective data, including from NYSDEC, and facts concerning the facility's operations establish that Seneca Meadows is not adversely impacting residents' health. For example, in 2019, NYSDEC issued a Community Air Screen report for Seneca Falls, which analyzed samples collected by the Seneca Falls Environmental Action Committee around the Seneca Meadows Landfill for potential air quality concerns. NYSDEC concluded that the results "would not be considered a potential health threat or an immediate public health concern," and that "all results were similar to concentrations found in NYSDEC's ambient [background] air monitoring network." A copy of this report is included as **Exhibit A**.

Similar sampling undertaken by NYSDEC in 2013 reinforces these conclusions. Again, as stated by NYSDEC, all results were "well below the short-term health-based air concentration values and therefore are not considered an immediate public health concern. Additionally, the sampling results are below or within an order of magnitude of the long-term health-based air concentration values and similar to air concentrations found at stationary monitors in the [NYSDEC] ambient air monitoring network." A copy of this report is included as **Exhibit B**.

More recently, the Draft Environmental Impact Statement ("DEIS") for the expansion of the Seneca Meadows Landfill provides data and an assessment showing that neither the current Landfill operation nor the proposed expansion will cause significant air quality impacts. Among other items, the DEIS concludes:

- Surface emission monitoring demonstrates the effectiveness of the existing landfill gas collection and control system. DEIS at 4-10.
- The expansion design is predicted to achieve an overall gas collection efficiency of 89 percent, which favorably compares to efficiencies achieved across the industry. DEIS at 4-10.
- For the proposed expansion, Seneca Meadows' consultants undertook highly conservative modeling to assess impacts associated with the Facility and concluded:
  - "Based on the detailed analyses which were conducted . . . no significant adverse impacts associated with air emissions from the proposed [Seneca Meadows] Valley Infill are expected to occur."
  - "During the year when peak emissions are expected to occur from the [Seneca Meadows] Valley Infill, concentrations of compounds modeled specific to landfill gas are not projected to exceed individual health-based guidance values or applicable standards or guidelines established by the USEPA and NYSDEC." DEIS at 4-14.

Relevant sections of the DEIS are included as **Exhibit C**.



These analyses show the statements by Seneca Lake Guardian that emissions from the Seneca Meadows Landfill are causing or contributing to adverse health effects are demonstrably false.

## **II. False claims about odor impacts.**

Seneca Lake Guardian has published numerous statements asserting widespread odor impacts from the Seneca Meadows Landfill, including the following:

- “Since 2018 there have been nearly 500 complaints confirmed by [Seneca Meadows] of Odor on site ranging from 1-12 miles away from the landfill.”<sup>2</sup>
- “[Seneca Meadows] was asked to come to the table and work with the town to address odor reporting, they said no.”<sup>3</sup>
- “The odor of Seneca Meadows can be smelled from miles away.”<sup>4</sup>
- “[T]he landfill is . . . pumping a putrid odor far and wide . . .”<sup>5</sup>

Over the period cited in these comments and well prior, Seneca Meadows has not been found in violation of any state or local odor standard. The assertion that an odor, let alone an offensive odor, “miles away” has been sourced to the Seneca Meadows Landfill is false, as shown by recent air monitoring. Further, Seneca Lake Guardian’s statements mischaracterize the odor complaint logs.

Mere detection of an offsite odor does not confirm that the Seneca Meadows Landfill is the source or that the odor is offensive. The odor complaint data for the 12-month period (August 2021 – July 2022) illustrate this point. During this one-year period, an average of less than four offsite odor detections were confirmed per month (or less than one per week). Further, these rare “confirmed” complaints have been accompanied by N-Butanol readings that are less than “1,” which means the odor, though detected, is extremely faint and not offensive. Again, Seneca Meadows has never been found in violation of an odor standard. Seneca Meadows is also fully

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<sup>2</sup> <https://senecalakeguardian.org/Garbage-Landfills>

<sup>3</sup> <https://senecalakeguardian.org/Garbage-Landfills>

<sup>4</sup> <http://readme.readmedia.com/SLG-600-Signatories-Earthjustice-to-DEC-NYs-Largest-Landfill-Must-Be-Included-in-Prohibition/18881824>

<sup>5</sup> <http://readme.readmedia.com/SLG-Calls-on-First-Female-Gov-to-Shut-Down-Landfill-Dumping-on-the-Birthplace-of-Womens-Rights/18879889>

transparent about its odor investigations and responses to odor complaints, as it submits monthly odor reports to NYSDEC. *See Exhibit D.*

Moreover, Seneca Meadows has never refused to discuss any issue with the local municipalities, and is fully transparent about its odor investigations and responses to odor complaints. As a long-standing practice, Seneca Meadows' District Manager regularly attends Seneca Falls Town Board meetings and is available to answer questions from both the Town and its residents. In addition, Seneca Meadows sends copies of the monthly odor reports submitted to NYSDEC to the Town of Seneca Falls.

Seneca Meadows has also gone well beyond the regulatory requirements to ensure that it does not generate offensive offsite odors. Among other measures, in April 2022, Seneca Meadows installed four Acrulog monitors just beyond the perimeter of the Landfill to record hydrogen sulfide (H<sub>2</sub>S) concentrations—the primary compound associated with landfill odors—on a continuous basis. New York's ambient air quality standard for H<sub>2</sub>S provides that over any one-hour period, the average concentration of H<sub>2</sub>S must not exceed 0.010 parts per million (ppm). The standard is intended to protect against odors unreasonably interfering with the comfortable enjoyment of life and property.

The data recorded by the four perimeter monitors has not shown a single instance where Seneca Meadows exceeded NYSDEC's H<sub>2</sub>S standard. In fact, since installation, H<sub>2</sub>S readings at all monitors have virtually always been non-detect. *See Exhibit E* (cover letters for reports submitted to NYSDEC detailing results from June 1, 2022 (when monitors began operation) through September 24, 2022, as well as data set for most recent report). If Seneca Meadows were generating odors that could be detected "miles away," data collected from the perimeter Acrulog monitors would be markedly different, showing exceedences of the NYSDEC's H<sub>2</sub>S standard.

These facts contradict Seneca Lake Guardian's disparaging and unfounded statements regarding odors from the Seneca Meadows Landfill.

### **III. False statements about trucks.**

Seneca Lake Guardian has published false claims about the trucks entering the Seneca Meadows Landfill, including that "[Seneca Meadows] allows Trucks all through the night after closed hours to sit and rot with their stench over night before filling during operating hours."<sup>6</sup>

Seneca Meadows' sound environmental and operational practices ensure these impacts claimed by Seneca Lake Guardian do not occur. Due to varied departure times and distances, a number of trucks will reach Seneca Meadows outside of facility operations hours. If not allowed

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<sup>6</sup> <https://senecalakeguardian.org/Garbage-Landfills>



entry to the site, these trucks would be forced to find alternative offsite locations in and around Seneca Falls and Waterloo to remain overnight. This in turn would cause unnecessary traffic congestion and potential air pollution, as these and other arriving trucks vie to enter the site within the same morning timeframe. These impacts to the community are avoided by allowing trucks to enter the site outside of facility operational hours. The trucks are also staged in areas with 24-hour state-of-the-art odor-neutralizing equipment to prevent the “stench” that Seneca Lake Guardian falsely claims. If these trucks were creating such a stench, then the Acrulog monitors, which operate 24 hours a day, would show it.

As with Seneca Lake Guardian’s other claims, this contention is contradicted by facts and can only be construed as an attempt to place Seneca Meadows in a false light.

#### **IV. False Claims about Seneca Meadows’ compliance status.**

Seneca Lake Guardian has made numerous statements, several of which are listed below, attacking Seneca Meadows’ compliance status by claiming it is “in violation” of NYSDEC’s regulations governing air emissions and odors, the Town Code, and the host community agreement.<sup>7</sup> These false claims are particularly insidious because they directly attack Seneca Meadows integrity and reputation, and attempt to harm its standing in the community.

As discussed above, Seneca Lake Guardian’s claims about odors from the Seneca Meadows Landfill are debunked by data and facts. Despite strict oversight by NYSDEC, including a full-time onsite environmental monitor, and close scrutiny by Seneca Falls, no agency has adjudicated an odor violation against Seneca Meadows. And NYSDEC has never issued a notice of violation to Seneca Meadows pertaining to odors. The Acrulog monitor data further confirms that Seneca Meadows is not in violation of any odor standard.

Similarly, Seneca Meadows is not “in violation” of any Town Code provision; there are no pending or adjudicated violations of the Town Code against Seneca Meadows.

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<sup>7</sup> Seneca Lake Guardian has claimed:

“SMI is in violation of their current Town Code.”

“SMI is in violation of their Host Community Agreement.”

“SMI is in violation of NYC Part 211.1 DEC regulations.”

Further, Seneca Meadows has never violated the host community agreement—even when a prior Seneca Falls administration refused to fulfill its own obligations under the agreement, Seneca Meadows continued to make host fee payments (which total between \$3 million and \$4 million annually) to Seneca Falls. The benefits of Seneca Meadows’ contributions to the local community are evident.

#### **V. False Claims about Seneca Meadows’ impacts on tourism.**

Seneca Lake Guardian has falsely claimed that Seneca Meadows is causing adverse impacts to the local tourism industry and hampering job growth in that sector:

- “[Seneca Meadows] 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. 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.”<sup>8</sup>
- “Owned by Texas-based Waste Connections, the landfill is polluting our water and air, while pumping a putrid odor far and wide and threatening our \$3 billion, 60,000 job agritourism industry.”<sup>9</sup>

Seneca Meadows has been in operation for decades; no evidence supports these claims of negative impacts on area tourism or agritourism. In fact, a recent report issued in June 2022 by Empire State Development, “Economic Impact of Visitors in New York 2021 - Finger Lakes Focus,” confirms that the Finger Lakes region has recovered from impacts to tourism due to COVID-19, and at a rate that outperforms several other regions in the State and the State average. Moreover, recovery in Seneca County in terms of traveler expenditures is ahead of the Finger Lakes average. The report explains: “Despite the strong recovery in spending, the recovery in visitor-supported jobs has been slower as pandemic related labor force distortions continue to affect tourism-centric industries.” In other words, jobs in this sector have lagged due to general industry-wide trends, not due to the presence of the Seneca Meadows Landfill, as Seneca Lake Guardian has falsely stated. Seneca County’s tourism jobs outperform many other counties in the Finger Lakes region as a share of the total work force. The report is attached as **Exhibit F**.

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<sup>8</sup> <http://readme.readmedia.com/SLG-600-Signatories-Earthjustice-to-DEC-NYs-Largest-Landfill-Must-Be-Included-in-Prohibition/18881824>

<sup>9</sup> <http://readme.readmedia.com/SLG-Calls-on-First-Female-Gov-to-Shut-Down-Landfill-Dumping-on-the-Birthplace-of-Womens-Rights/18879889>



Other recent reports further debunk Seneca Lake Guardian's claims. In 2021, the Genesee/Finger Lakes Regional Planning Council explained that tourism revenue in Seneca County has increased more since 2005 (by 86 percent) than any other county in the region. *See Exhibit G.* A 2019 report by the Finger Lakes Tourism Alliance explains that Seneca County was the top county in 2018 for tourism in the Finger Lakes region, accounting for 11% of visitors. *See Exhibit H.* Also in 2019, the Seneca County Chamber of Commerce reported to the County Board of Supervisors that 4.8 million visitors came to the Finger Lakes Region, with Seneca County seeing 11 percent of all visitation traffic (the most among the 14-county region).<sup>10</sup>

Finally, a February 2022 Report from the Seneca County Board of Supervisors and the Seneca County Agricultural Enhancement Board explains that agriculture "has been and continues to be a mainstay of the Seneca County economy." According to the report, farms and associated wineries, breweries, cideries, and distilleries in the area generate revenues through "value-added production and tourism," and five percent of farms in the county earn income through agritourism. The report lists the 14 primary challenges to area agriculture, none of which include the Seneca Meadow Landfill. *See Exhibit I.*

As these reports demonstrate, Seneca Lake Guardian's claims that Seneca Meadows is adversely impacting local agritourism have no basis in fact.

## **VI. Other false and misleading statements by Seneca Lake Guardian.**

Seneca Lake Guardian has also perpetuated other false and misleading statements on other issues, including its statements that "the landfill is polluting our water," and Seneca Meadows is "contaminating drinking water across the state."<sup>11</sup>

Leachate generated at the Seneca Meadows Landfill does not pose a threat to community health or the drinking water supply. Seneca Meadows Landfill operates a leachate collection system, which is divided into four components: a leachate collection system, a leachate conveyance system, a leachate storage and transfer system, and a leachate treatment system. Each component has been designed to comply with applicable NYSDEC design and performance criteria set forth in 6 NYCRR 363-6.10, 363-6.11, and 363-6.20. *See Exhibit J.* Seneca

<sup>10</sup> [https://www.fltimes.com/news/2019-said-to-be-very-good-year-for-tourism-in-seneca-county/article\\_f17c4670-1c49-5a1e-8c7b-1bf5069297b7.html](https://www.fltimes.com/news/2019-said-to-be-very-good-year-for-tourism-in-seneca-county/article_f17c4670-1c49-5a1e-8c7b-1bf5069297b7.html).

<sup>11</sup> <http://readme.readmedia.com/SLG-Calls-on-First-Female-Gov-to-Shut-Down-Landfill-Dumping-on-the-Birthplace-of-Womens-Rights/18879889>; <http://readme.readmedia.com/SLG-600-Signatories-Earthjustice-to-DEC-NYs-Largest-Landfill-Must-Be-Included-in-Prohibition/18881824>.



Meadows further treats and transports its leachate to permitted publicly owned treatment works (POTW) in accordance with their applicable permits and requirements. Prior to transporting the leachate to the Seneca Falls POTW, the leachate is treated on-site using state of the art biological and reverse osmosis treatment facilities that treats the leachate including the removal of PFAS. Seneca Meadows voluntarily implemented these systems, which are now incorporated into the Landfill's discharge permit.

Seneca Lake Guardian's statement that Seneca Meadows is "polluting our water" is particularly egregious because as an entity "dedicated to preserving and protecting the health of the Finger Lakes," it knows well (or should know) the causes of pollution in local water bodies. Following testing conducted in 2019 at the request of Seneca Lake Guardian, Seneca Lake tested positive for a detectable quantity of PFAS.<sup>12</sup> While Seneca Lake Guardian now blames Seneca Meadows for the presence of trace amounts of PFAS contamination in Seneca Lake, even though Seneca Meadows does not discharge to Seneca Lake, Seneca Lake Guardian previously blamed the 2019 PFAS test results on the Seneca Army Depot. Harmful algal blooms are negatively impacting local water bodies, including Seneca Lake. Yet, Seneca Lake Guardian appears to pay only passing attention to this very real threat to the health of the Finger Lakes.

Additionally, Seneca Lake Guardian paints a misleading and grossly incomplete picture about climate change impacts, claiming that 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."<sup>13</sup> As documented in Seneca Meadows' filings and explained on its website,<sup>14</sup> the landfill gas goes to multiple productive use systems at the adjacent Resource Recovery Park, including a landfill gas-to-energy facility that beneficially creates electricity, and a Renewable Natural Gas (RNG) facility used to produce pipeline quality natural gas that can be added to the nearby natural gas pipeline system. Landfill gas is also used to support other on-site beneficial use systems (e.g., for leachate treatment). *See Exhibit K.* Landfill gas is rarely sent directly to flares, which are redundant units required by Seneca Meadows' air permit. For this reason, much of the time the flares are idle. As required by its air permit, flares will be used to combust landfill gas when another productive use system such as the landfill gas-to-energy facility has an outage, or to periodically operate the flares as a maintenance check. Residual gas at the RNG facility is also flared, but this is post-beneficial use process combustion, not landfill gas sent directly to flares. Seneca Lake Guardian's misleading statement includes no recognition of the

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<sup>12</sup> <https://senecalakeguardian.org/Seneca-Lake-Guardian-Reports-On-PFAS-Testing>

<sup>13</sup> <http://readme.readmedia.com/SLG-600-Signatories-Earthjustice-to-DEC-NYs-Largest-Landfill-Must-Be-Included-in-Prohibition/18881824>

<sup>14</sup> *See* <https://senecameadows.com/gas-to-energy> and <https://senecameadows.com/renewable-natural-gas>.



multiple beneficial use systems used at the Seneca Meadow Landfill that mitigate greenhouse gas emissions and conflates direct landfill gas flaring with post-beneficial process combustion.

Decomposing waste mass will generate landfill gas regardless of where it is located, but these practices are beneficial mitigation measures from a climate change perspective:

- Whether by combusting landfill gas to generate electricity or flaring, the most harmful greenhouse gases like methane are destroyed. Further, electricity locally generated using landfill gas displaced the need for fossil fuels to produce that energy, including greenhouse gas emissions from producing and transporting those fossil fuels.
- By creating pipeline quality gas from landfill gas, an equivalent amount of fossil derived natural gas is offset, including the greenhouse gas emissions required to produce and transport that fossil derived natural gas from distant sources like the Marcellus shale formation.
- Since 2018, Seneca Meadows has beneficially reused almost 21 billion cubic feet of gas. For reference, the average gas well in the Marcellus yields about 2.5 billion cubic feet of methane over its lifetime. This means in the last 4 years, the Seneca Meadows Landfill has offset the equivalent of four natural gas wells in the Marcellus.
- Lastly, landfilling is a form of carbon sequestration, and therefore has climate change benefits.

Though well documented, these effective and beneficial climate change mitigation strategies employed by the Seneca Meadows Landfill are ignored by Seneca Lake Guardian and belie its reckless statements.

Landfill gas produced by decomposing waste is unavoidable. However, allowing Seneca Meadows Landfill to continue to operate and expand will mitigate greenhouse gas emissions. Failure to permit the expansion would drive up the exportation of waste, which would increase greenhouse gas emissions by forcing longer truck trips to alternative waste disposal sites, likely out-of-state. Once waste is sent to another facility, there are no guarantees that greenhouse gas emissions will be mitigated to the same degree. Seneca Meadows helps New York achieve its renewable energy and carbon footprint reduction goals.

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The foregoing illustrates Seneca Lake Guardian's recent false, misleading, and irresponsible statements about the Seneca Meadows Landfill. The intent behind these statements is obvious. Unable to attack Seneca Meadows based on facts, Seneca Lake Guardian resorts to publishing falsehoods about Seneca Meadows to harm its reputation in the community, before the agencies that regulate it, and its host municipalities.

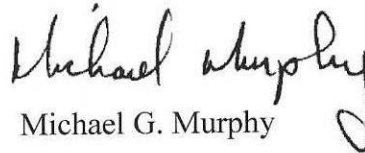
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Seneca Meadows welcomes a fact-based dialogue pertaining to any issues concerning the Landfill. But the Landfill has an obligation to its employees and many supporters in the community to defend itself and ensure that the public record is not distorted through falsehoods. In order to meet that obligation, we hereby demand that Seneca Lake Guardian promptly remove all false statements about the Seneca Meadows Landfill from its website and other forums and cease and desist from any further defamatory conduct.

Sincerely,



Michael G. Murphy

Enclosures

cc: Evan Thies, Pythia Public  
Alexis Grenell, Pythia Public