



**Testimony in support of LD 222, LD 400 & LD 407  
February 26, 2025**

Dear Representative Doudera, Senator Tepler, and esteemed members of Joint Standing Committee on the Environment and Natural Resources:

As the Coordinator for the Coastal Access Strategy Exchange (CASE), I am sharing support for all three bills related to AFFF and PFAS in Maine (LDs 222, 400 & 407) for individual members. CASE does not advocate for/against legislation as a whole body, so this testimony comes on behalf of the individual members listed below. CASE is a community of practice with a mission to - *Preserve and expand the footpaths, wharves, piers, and other working waterfront locations that provide essential access points to coastal fisheries and waters of the Gulf of Maine, supporting the economic well-being of fishing families, water-dependent businesses, and coastal communities.*

We consider coastal access in multiple dimensions, including physical access, regulatory access (licensing, permitting), and availability/health of the actual marine resource. The spill of firefighting foam in Brunswick resulted in the closure of the adjacent mudflats in Harpswell Cove, prohibiting the harvesting of shellfish by license holders in Brunswick. This closure is ongoing, and pending the results of additional meat samples for PFAS and other chemicals, the earliest the mudflats would be accessible to harvesters is September 2025. This is a minimum of a year where shellfish harvesters are not able to dig and sell or consume quahogs and soft-shell clams from this area. These mudflats were also the site of significant investments in quahog stock enhancement by the Town of Brunswick. Due to various threats to recruitment and survival of shellfish, it is uncertain whether the market-size shellfish in this area will still be viable when the mudflats are re-opened to harvest.

These bills propose critical steps towards reducing the risk of PFAS and other chemicals, both from a public health perspective, as well as from other communities that rely on shellfish for livelihoods and/or sustenance. An inventory of AFFF is the first step towards understanding where the risks are and starting to mitigate them. The take-back and disposal program will incentivize the safe disposal of firefighting foams. Prohibiting the use of AFFF at the former Brunswick Naval Air Station will prevent further environmental contamination and public health impacts.

Soft-shell clam landings are often the second or third most valuable fishery in the state (\$13.9 million in landed value in 2023, per DMR data). These bills will not only reduce risk of losing access to, or contaminating, wild shellfish, they also protect cultured shellfish species, and numerous juvenile species of fish and shellfish whose habitat is in the nearshore environment that could be affected by more chemical spills.

Please feel free to contact our group through emailing me ([Jessica@tidalbayconsulting.com](mailto:Jessica@tidalbayconsulting.com)).

**CASE Members:**

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