



Cayuga Lake Watershed Network  
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*Jill Henry, Director*  
*Seneca County Planning & Community Development*  
*SCLSWMP@co.seneca.ny.us*

**RE: Comment on Seneca County Draft Local Solid Waste Management Plan (dLSWMP)**

Dear Jill Henry,

The Cayuga Lake Watershed Network (the ‘Network’), as identified in the dLSWMP, is a membership-driven nonprofit organization founded in 1998. Our mission is to advocate for the health of Cayuga Lake and its watershed, and our programs promote science-backed community education and engagement. We recognize that the challenges our watershed faces come in many forms including but not limited to climate change, land use change, and pollution.

As such, we welcome many provisions of the Solid Waste Management Plan which move Seneca County toward a sustainable, circular economy including opportunities to reduce, reuse, recycle and find opportunities to safely extract value from the waste stream.

We have two comments regarding areas of concern in the dLSWMP:

1. We caution Seneca County regarding WWTP biosolids land application as a beneficial use of this material. As noted in the dLSWMP, these biosolids are known sources of contamination. Many persistent organic pollutants, and emerging contaminants of concern like microplastics and PFAS are currently present and unmonitored in biosolids. The EPA’s Inspector General report determined that “regulations regarding land application of biosolids were incomplete and may not fully protect human health and the environment,” citing 352 pollutants in biosolids, including “61 designated as acutely hazardous, hazardous or priority pollutants in other programs.” Land application of contaminated biosolids can lead to increased human exposure via crops, surface water, and groundwater. We are acutely aware that in our region, this has already occurred in the vicinity of agricultural fields in Steuben County where biosolids have been spread.

2. Public health and environmental health for Seneca County communities, especially those most directly impacted by waste management and landfill operations must be prioritized, but it is not mentioned explicitly anywhere in the dLSWMP. Finalizing this dLSWMP without this, but with over-reliance on the status quo, particularly before the SEQR Environmental Impact Statement process for SMI Landfill expansion is completed and the extent of the environmental impacts of

SMI Landfill Valley Infill project are thoroughly vetted by the agency with public comment and independent analysis appears to be a serious oversight.

We urge the county to strengthen the dLSWMP in these two areas to increase protection of our watershed and its communities while achieving ambitious waste reduction goals.

Thank you,

A handwritten signature in black ink, appearing to read 'Liz Kreitinger', written in a cursive style.

Date: 11/15/2024

Liz Kreitinger  
Steward/Executive Director, Cayuga Lake Watershed Network