



Cayuga Lake Watershed Network
PO Box 348
Aurora, NY, 13026
www.cayugalake.org

The Honorable Kathy Hochul
Governor of New York State
NYS Capital Building
Albany, NY, 12224

January 8th, 2024

RE: Require complete environmental review of Cargill’s Cayuga Salt Mine including public participation and long-term protections for Cayuga Lake

The Cayuga Lake Watershed Network (the ‘Network’) is an independent community-based nonprofit organization founded in 1998. Our mission is to advocate for the health of Cayuga Lake and its 870 square mile watershed in a rapidly changing world, and our programs promote science-backed community education and engagement. We advocate for robust environmental policies, collaborating with government agencies and engaging with the wide range of stakeholders in our community to develop well-balanced science-based solutions to environmental challenges in the watershed. We believe that sound economic development and environmental protection must go hand-in-hand to sustain the health of Cayuga Lake.

We are deeply concerned about the current and future environmental risks associated with the Cayuga Salt Mine operated by Cargill under Cayuga Lake in Lansing, New York, drinking water source to over 100,000 residents. Salt mining beneath Cayuga Lake began before the adoption of the State Environmental Quality Review (SEQR) Act in 1978 and we believe these operations have been permitted since then with insufficient environmental review. Furthermore, the outdated Environmental Assessment (EEA) which the mine operates with has never been fully disclosed to the public. Most recently, we are concerned by reports that a FOIL request submitted by a regional reporter to the DEC on 11/30/23 for a single document, Cargill’s application to modify its current mining permit has been irregularly delayed. Reports that Cargill is positioning itself to sell the mine call for immediate action by your office.

We are calling on Governor Hochul and the Department of Environmental Conservation to act now and require that a complete environmental review as outlined by the SEQR Act be conducted for Cargill’s Cayuga Salt Mine. Immediate and long-term protections must be put in place for the irreplaceable freshwater that supports our Cayuga Lake communities and ecosystem:

- **A transparent Environmental Impact Statement (EIS) must be completed, including public participation,** that evaluates the long-term potential impact of the mine’s operations to our lake’s water quality and ecosystem. An EIS would involve participation from surrounding community members and technical experts in appropriately identifying potential environmental risks from the mining operation in

general, and from the geologic anomalies that are situated between the rock currently being mined and below the bottom of the lake.

- **An end-of-life plan must be required and approved by the DEC to ensure safe closure of the portion of the mine beneath the Lake** to mitigate the potential impact of the mine’s operations on the Lake’s water quality in the future. This is a requirement of the Mined Land Reclamation Law, but not yet required of Cargill by the DEC.
- **Cargill or any future buyer, must be required to post a \$1+ billion environmental bond** (or a value to be established by an independent natural resource economist) with New York State to ensure the availability of adequate funding to implement the end-of-life plan and to compensate both private and public entities for any natural resource damage claims.
- **Impose a moratorium on any sale of the mine and mining operations until a sufficient EIS has been completed and sufficient environmental bond is set in place.**
- **Require Cargill to close the mine if an EIS confirms unacceptable risk to Cayuga Lake.** Ensure retraining opportunities and generous benefits for all employees in the event Cargill decides or is required to close Cayuga Salt Mine.

Our watershed communities have never had their voices heard in a complete environmental review including meaningful public participation. According to the DEC, *“The DEC encourages you to get involved especially when environmental decisions are being made that will impact you, your family and community. Your opinion matters and you can be part of the process.”* For decades, this has not been the case for our community, including the newly recognized NYS Disadvantaged Communities in our watershed who rely on our lake as a freshwater resource.

Concerns about the environmental risk are detailed in our 2017 letter to your office as well as the recent letters sent to your office by Cayuga Lake Environmental Action Now and their ongoing petition including over 3000+ signatures, the Cayuga Lake Watershed Intermunicipal Organization, the Tompkins County Water Resources Council, the Tompkins County Environmental Management Council, the Tompkins County Legislature, and others.

We must ensure that Cayuga Lake remains a healthy “working lake”—supporting a broad range of uses and economic activities that are critical to all communities in the Cayuga Lake Basin. It is our understanding that as Governor, you may exercise your executive authority to compel the relevant agencies to act as outlined above on behalf of the people of NYS. The Cayuga Lake Watershed Network is prepared to serve as a local stakeholder liaison and partner to agency staff in this critical effort.

Sincerely,



Date: 1/8/2024

Elizabeth Kreitinger,
Steward/Executive Director
Cayuga Lake Watershed Network

Submitted with unanimous approval of the Cayuga Lake Watershed Network Board of Directors

CC:

NYS Executive Chamber

Ashley Dougherty Asst. Sec. for Environment

NYS Legislators

Jeff Gallahan, Assembly, District 131

Deborah Glick, Assembly, Chair, Committee on Environmental Conservation

Pete Harckham, Senator, Chair, Committee on Environmental Conservation

Carl Heastie, Assembly Speaker

Anna Kelles, Assembly, District 125

Rachel May, Senator, District 48

Thomas O'Mara, Senator, District 58

Philip Palmesano, Assembly, District 132

Andrea Stewart-Cousins, Senator Majority Leader

Lea Webb, Senator, District 52

NYS Department of Environmental Conservation

Basil Seggos, Commissioner

NYS DEC-Division of Mineral Resources

Dereh Glance, Director, Region 7

Edward Hampston, Director, Bureau of Water Compliance

Monica Moss, Division of Water

Tony Prestigiaco, Finger Lakes Hub

Matthew Russo, Division of Water Engineer, Region 7

Margaret Sheen, Attorney, Region 7

Jonathan Stercho, Deputy Permit Administrator, NYS DEC Region 7

Thomas Vigneault, Engineer, Region 7

Timothy Walsh, Director, Region 8

Christopher Otis, Mined Land Reclamation Specialist, Region 8

NYS Office of General Services

Jeanette Moy, Commissioner

NYS Department of Health

County Representatives and Watershed Agencies

Cayuga Lake Watershed Intermunicipal Organization

Tompkins County Water Resources Council

Tompkins County Whole Health

Cayuga County Water Quality Management Agency

Tompkins County Legislators

Seneca County Board of Supervisors