



Cayuga Lake Watershed Network  
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Jonathan Stercho, Assistant Regional Permit Administrator  
NYSDEC Region 7 Headquarters  
Division of Environmental Permits  
5786 Widewaters Parkway  
Syracuse, NY 13214

[Comment.CayugaSaltMine2023@dec.ny.gov](mailto:Comment.CayugaSaltMine2023@dec.ny.gov)

January 19<sup>th</sup>, 2025

Dear Mr. Stercho,

Re: Comments on Cargill's Application (0-9999-00075/00001) to Renew and Modify its Mined Land Reclamation Permit for the Cayuga Salt Mine

The Cayuga Lake Watershed Network (the 'Network') is an independent nonprofit organization supported by over 400 members. 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 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.

Cargill is applying to renew and modify its permit for a new five-year term, with changes allowing the disposal of up to 360 million gallons of wastewater (brine) into the 6-level section of the salt mine beneath Cayuga Lake. If approved, this plan would result in the complete flooding of the abandoned S3 Zone of the mine under the lake with wastewater. This flooding process is projected to take 15 years, after which the inundated mine area would become inaccessible for any other use or purpose, including the ongoing stability monitoring currently required for all parts of the mine. The Department of Environmental Conservation (DEC) has taken on the role of lead agency under the State Environmental Quality Review Act (SEQR), classified the proposal as a Type I action, and issued a Negative Declaration.

We remain 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, as described in detail by comments regarding this permit application, submitted by Cayuga Lake Environmental Action Now (available online at <https://cleancayugalake.org/wp-content/uploads/2025/01/CLEAN-Request-for-Hearing-and-Comments-re-Cayuga-Salt-Mine-4.pdf>), as well as previous concerns about the environmental risk which are detailed in our 2017 and 2024

letters to your office as well as the recent letters sent to your office by Cayuga Lake Environmental Action Now and their petition which included 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.

**Due to the potential adverse impacts on groundwater and Cayuga Lake – we are calling on the Department of Environmental Conservation to comply with SEQR and either deny the permit or rescind the negative declaration and require that both a complete environmental review and public hearing be held for the entire 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 designed and managed by DEC and not by Cargill or one of their consultants. This EIS would include robust public participation including a hearing in the Town of Lansing.** This EIS would evaluate 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.

**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.

We must ensure that Cayuga Lake remains an ecologically and environmentally healthy “working lake”—supporting a broad range of uses and economic activities that are critical to all communities in the Cayuga Lake Basin. The Cayuga Lake Watershed Network is prepared to serve as a stakeholder partner to agency staff in this critical effort.

Sincerely,



Elizabeth Kreitinger,  
Steward/Executive Director  
Cayuga Lake Watershed Network

Date: 1/19/2025

Cc:

OGS Commissioner Jeanette Moy (officeofthecommissioner@ogs.ny.gov)

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Shawn Wilczynski, Mine Manager, Cargill (Shawn\_Wilczynski@cargill.com)