

(Date to be changed)

October 24, 2024

Ms. Dereth Glance
Regional Director, DEC Region 7
New York State Department of Environmental Conservation
5786 Widewaters Parkway
Syracuse, NY 13214-1867
mailto:Dereth.Glance@dec.ny.gov

RE: Modification of Operating Permit issued by Department of Environmental Conservation (DEC) to Cargill, Inc for Cayuga Salt Mine, Permit application (permit ID # 0-9999-00075/00001, Mined Land ID 70052) in the Town of Ulysses, Tompkins County, NY

Dear Ms. Glance,

The Town of Ulysses has recently learned about Cargill's application to include brine disposal within the Town of Ulysses in their salt mining operating permit from Cayuga Lake Environmental Action ([CLEAN](#)). We wish to express concern about this material change without any publicly reviewed study on the flooding of the mine, closure plans or potential impacts to Ulysses residents from subsidence, room closure or brine leakage.

The proposed brine storage, as detailed in the "Notice of Incomplete Application" (NOIA) from January 17, 2024, raises potential environmental risks. We are particularly concerned about the potential for mine collapse and subsequent damage to Cayuga Lake's shoreline, as evidenced in prior reports, including the 2014 John T. Boyd review, which noted structural instability in nearby areas of the mine. Any catastrophic collapse or increased salinization of the lake could have long-term, irreversible impacts on both our natural environment and local economy.

We believe that any activity within the S3 area constitutes a material change in mine management and should therefore be subject to review under the State Environmental Quality Review Act (SEQRA). We respectfully request that the DEC require an full Environmental Impact Statement (EIS) to assess whether keeping the mine dry could better protect Cayuga Lake from future salinization.

Municipalities have long exercised home-rule authority in regulating activities within our boundaries, as recognized by the DEC and New York State Department of State. Although our jurisdiction operates under certain limitations, including state-level preemptions, we have a vested interest in safeguarding our community, our environment, and natural resources, particularly Cayuga Lake and the surrounding area. Cargill's actions are in direct conflict with town law for the Lake Shore (LS) zone, set forth in the town's zoning [[Chapter 212-2 \(A\) and \(B\)](#), and [212-42](#) through [212-46](#)]. The Cargill proposal appears to be located entirely within this zone as it is defined in our zoning code. We ask that your department weigh the environmental

and public health and safety concerns of the Town and will engage in a conversation with the Town before proceeding any further on Cargill's application.

We are also aware from your letter to CLEAN that a "SEQR review is being conducted to assess the potential environmental impacts". However, as a municipality directly affected by these activities, we believe the Town of Ulysses must be regarded as an interested party in the SEQR review process and any permit modifications or renewals concerning the Cayuga Salt Mine. We ask that the DEC ensure our involvement in such processes moving forward.

We trust that the DEC will act in accordance with its mission to protect New York's natural resources and public health by addressing these critical environmental concerns. We urge you to require a full environmental review before any further steps are taken with respect to brine storage in the S3 area.

Thank you for your attention to this matter. We look forward to your response.

Sincerely,

Katelin Olson, Town Supervisor

Town of Ulysses Board Members: _____, _____, _____, _____

Ulysses Conservation and Sustainability Advisory Council (**names of voting members needed**)

CC:

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