

Dear Friends of Cayuga Lake,

May 17, 2024

Happy Spring!

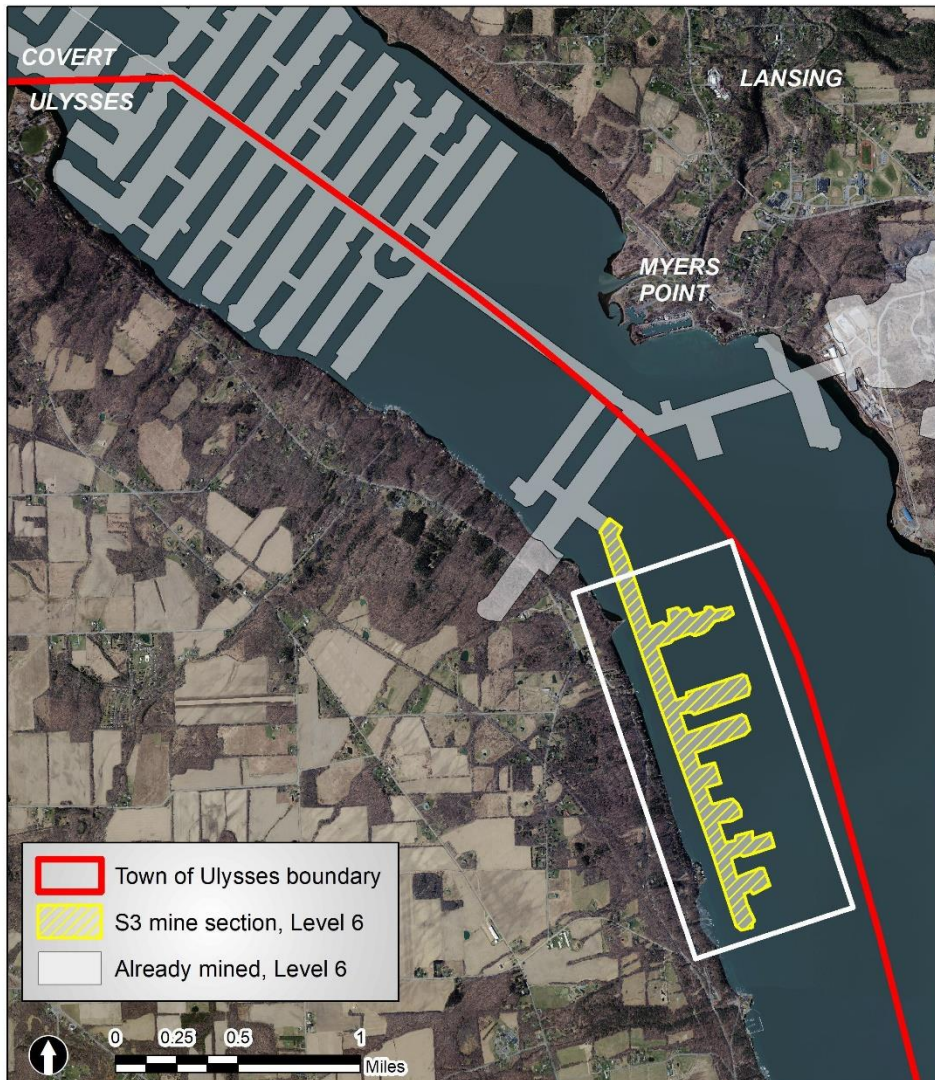
We are looking forward to getting back out onto the lake soon and hope to see you out there. We would like to take this opportunity to update you on the ongoing efforts of Cayuga Lake Environmental Action Now (CLEAN) to have Cayuga Salt Mine shut down. Cargill's mining permit expired on April 24th, but the Dept of Environmental Conservation (DEC) is allowing mining to continue pending some additional information the DEC has requested related to Cargill's on-going but not-yet-permitted flooding of the southern S3 portion of the mine under the lake. This flooding of the mine preempts the right of New York State to repurpose the mine voids for other purposes or to protect the lake from salinization by keeping the mine dry. Help us oppose both continued mining under the lake and the unpermitted flooding of the S3 portion of the mine!

As can be seen from this [mine comparison chart](#), we think that Cayuga Salt Mine is no longer commercially viable. We think Cargill is having trouble selling the mine to a competent salt mining company that understandably would want to buy a mine that is profitable, is not required to post an environmental bond that might be in the billions of dollars, and which is not putting a large invaluable lake at significant risk of higher salinity levels over the longer-term.

Increased Risk of Mine Collapse if Unpermitted Flooding of the S3 Area Continues

In June 2023, Cargill submitted [an application to modify its mining permit](#) to allow Cargill to slowly flood the southern S3 portion of its 6-level mine under Cayuga Lake over the next 15 years. The application was only made public recently, and we noted that Cargill's consultant, RESPEC, [has warned that commencement of flooding in this seismically-unstable area of the mine would result in an immediate 95% weakening of the first 15 feet of roof rock above the S3 areas being flooded](#). Sensing that RESPEC might conclude that flooding the S3 area was an invitation for mine collapse, Cargill pulled the plug on the RESPEC study and instead hired Agapito Associates, a mine engineering company with no prior experience at Cayuga Salt Mine that we are aware of and whose web site

mentions no prior projects involving salt mines.



The proposed S3/E3-E9 flooding zones in Cayuga Salt Mine in relation to Town of Ulysses boundaries

Somewhat predictably, this new consultant concluded that—once the S3 area is completely flooded—the water in S3 area would provide some additional support to the roof rock. However, that conclusion fails to comment on the risks of mine collapse during the 15 years that Cargill projects it would take to flood the S3 area and during which the rising flood waters would not be providing any support to the roof rock.

The mining consultant for the DEC regarding the salt mine has been the John T. Boyd Co. for more than twenty years. However, following a mine permit revision in 2021, the permit now states that Boyd “is Cargill’s consultant and Cargill is responsible for funding and managing the Consultant.” Because Boyd is no longer independent of Cargill, but now “is a Cargill consultant”, it is not at all surprising that Boyd has signed off on the flooding of S3, writing on p. 7 of the above-linked report, "that this sump will not cause global instability of the mine, the S3 Submain, or E5 panel." Governor Hochul needs to halt this highly-conflicted situation and ensure that New York States receives unbiased advice regarding Cayuga Salt Mine.

A mine collapse risks creating a destructive vortex if the lake begins to drain into the mine especially if the a mine collapse were to occur under a shallow area of the lake. Such a vortex occurred in 1980 when a Texaco drilling rig connected Lake Peigneur in Louisiana with the salt mine beneath it. The drilling rig, 11 barges and 65 acres of a nearby botanic garden all disappeared into the vortex. While there are differences in comparing Lake Peigneur and Cayuga Lake and their underlying salt formations, we choose to err on the side of caution and plan to engage a hydrology team to study whether or not such a vortex could also occur following a mine collapse at Cayuga Salt Mine.

Environmental Impact Statement Still Needed

Once a hydraulic connection exists between the lake and a flooded salt mine, there is the risk of increased salinization of Cayuga Lake for many years if not permanently. CLEAN is therefore opposing Cargill’s ongoing flooding of the S3 area. We believe that the material change it presents requires adherence to the State Environmental Quality Review (SEQR) process, and thus a full environmental impact statement (EIS) prior to Cargill’s mine permit being extended or amended to allow any flooding within the 6-level of Cayuga Salt Mine.

CLEAN has called on Governor Kathy Hochul to require Cargill to complete an environmental impact statement and post a \$10B bond to be held by New York State until all of the mine voids have closed, a process that could take several hundred years.

The DEC has reviewed Cargill's application for the modification of their mining permit and deemed it incomplete, asking Cargill to provide additional information.

Currently, the DEC has yet to conclude that this application calls for material changes and should undergo a Type I review under SEQR. Once the application is considered complete, there will be a 30-day public notice period during which your input and concerns will be essential.

We encourage all residents to prepare for the upcoming public comment period and to voice their concerns regarding the preservation and protection of Cayuga Lake.

We need your help to protect Cayuga Lake

For the past 25 years there has been widespread public support for requiring Cargill to produce an EIS. In addition to former Assembly Members Marty Luster and Barbara Lifton, Assembly Member Anna Kelles and State Senator Lea Webb have recently introduced draft legislation in the Senate and Assembly to enhance environmental oversight of the Cargill Salt Mine. This legislation reaffirms the need for an EIS and the creation of a \$10 billion environmental bond. **We urge you to contact Senator Webb regarding bill S.7736**

(<https://www.nysenate.gov/senators/lea-webb/contact>) and Assemblymember Kelles regarding bill A.8250 (<https://nyassembly.gov/mem/Anna-R-Kelles/contact/>) to thank them and express your support for this legislation before the end of session on June 6th.

It is crucial that we emphasize the urgent need to protect Cayuga Lake water quality from the risks of salt mining as well as provide a sufficient bond value to remediate any major negative environmental impacts. The bill also requests a period of post-closure monitoring to address any post-closure damages as the mine voids begin to close over time.

Thank you for your continued support and involvement in our mission to protect Cayuga Lake and its surrounding environment. We kindly request a tax-deductible donation to our fiscal sponsor, the Chris Dennis Environment Foundation. Donations can be made conveniently through our [donation page](#). We will keep you updated on further developments and provide more information regarding the public comment period.

In Solidarity,

Stephanie Redmond
on behalf of
Cayuga Lake Environmental Action Now

Clean the Lake.
Protect the Lake.