

Office of Parks Comment of July 2, 2019:

In reviewing this project, we noted that the newly proposed mine expansion will bring the commercial operations up to the boundary of Watkins Glen State Park. The park was designated eligible for inclusion in the New York State and National Registers of Historic Places in 2016. The park has been used by recreation seekers since the mid-19th century and remains today one of the state's most scenic destinations.

Section 14.09 (NYSPRHPL) states: "Generally, adverse impacts occur under conditions which include but are not limited to (a) destruction or alteration of all or part of a property; (b) isolation or alteration of its surrounding environment; (c) introduction of visual, audible, or atmospheric elements that are out of character with the property or alter its setting; or (d) neglect of property resulting in its deterioration or destruction."

Our office is particularly concerned with section (c) above and the specific impacts to the park that might arise from the mine expansion. We found no assessment of anticipated increases in noise, dust, vibration, truck traffic or other direct and indirect impacts that the expansion of this extractive industrial would have on the historic park.

It is our belief that an expansion of the mining operation up to the boundary of the state land has significant potential to adversely impact the historic character of the park. As such, we are requesting that an assessment of these factors be provided to this office as part of a more comprehensive alternatives analysis. This study should assess efforts that would avoid or minimize such impacts.