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2.13.2024

Frances Knickmyer
NYSDEC Region 8 Headquarters
6274 E Avon-Lima Rd
Avon, NY 14414

**RE: It's Greener Now Inc – Padua Gravel Pit DEC ID# 8-4424-00006/00001; ML# 80244
Article 23 - Mined Land Reclamation Watkins Glen (V), Dix (T), Schuyler County**

Dear Ms. Knickmyer:

Seneca Lake Guardian (SLG) is a New York State Not-for-Profit Corporation 501(c)(3) and is dedicated to preserving and protecting the health of the Finger Lakes, its residents and visitors, its rural community character, and its agricultural and tourist related businesses through public education, citizen participation, engagement with decision makers, and networking with like-minded organizations. We all have a responsibility to do everything we can to protect the region's clean air, water, soil and health for generations to come.

We have many concerns about the recent proposal to expand the Padua Gravel Pit in the Town of Dix to nearly five times its existing size.

First and foremost, the proposed period of time to comment is insufficient to review the 784 pages of documents that are on file with the DEC, and prevents the public from having an opportunity to consult with the necessary experts to review the record. We request that the public be given extended time and opportunity to review the application, particularly since the applicant was given 16 years to prepare it.

The current plan appears to impact noise, traffic and hydrological characteristics of the mine site and the DEC must allow sufficient time to analyze those and other issues.

The applicant failed to adequately assess the specific impacts to the Watkins Glen State Park that might arise from the mine expansion. The park drew a record 1.3 million visitors in 2023, and is a major source of tourism revenue to the area. A more detailed assessment of anticipated increases in noise, dust, vibration, truck traffic or other direct and indirect impacts that the expansion of this extractive industry will have must be completed as it relates not only to this historic park, but to the residences and visitors of the Village.

Due to climate change, more and more extreme weather events are experienced in the area. The mine is located on a steep hill and could negatively impact the Village's antiquated stormwater system. Severe weather events have already caused flooding as water rushed from the park's gorge down the village



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canal, forcing the park to close. A more extensive evaluation of how the mine's expansion could become compromised in the event of another severe weather event must be included.

Particle or soot pollution is one of the most dangerous forms of air pollution, and an extensive body of science links it to a range of serious and sometimes deadly illnesses including heart attacks and premature death, which is why the EPA recently strengthened the National Ambient Air Quality Standards for Particulate Matter (PM NAAQS) to protect millions of Americans by setting the level of the primary (health-based) annual PM2.5 standard at 9.0 micrograms per cubic meter. Has a thorough analysis of the particulate matter created by the mine's expansion been completed using these new parameters?

Research indicates that there is a buried gorge connected to the Watkins Glen State Park which may flow beneath the proposed mine's expansion. Was there any seismic refraction or hydrogeological testing completed at the proposed site?

The property also abuts the historic St. Mary's cemetery, one of the most beautiful and peaceful places around. Residents and visitors alike stroll the grounds where one of the prominent mausoleums is the Barrett-Rothschild monument to a victim of the sinking of the Titanic. People go to places like this to contemplate on the lives of loved ones and for the verdant beauty and peace and quiet. Noise and dust intruding on the cemetery all day every day from 6am to 8pm cannot be mitigated.

Finally, we share the concerns of others that the mine's expansion in a major tourism hub could have a negative impact on the area's community character. Potential negative impacts on the viewshed from particular points, including from the lake itself, is inconsistent with our thriving tourist industry and all of the jobs it creates, which depend on presenting clean air, with quiet, bucolic scenery, and a healthy environment for our visitors.

For example, the existing mine is already visible from several locations including from Seneca Lake. There are 3 boats that take tourists out on the lake by the thousands all summer long, on sailing charters and dinner cruises. A 75-acre scar on that hillside, visible from points North and East, from the lake and from the Seneca Lake Scenic Byway is antithetical to the expectations that they have for a vacation. That visual blight cannot be mitigated.

The DEIS estimates that over the life of mine of 20 years, 3,500,000 cubic yards of material will be extracted from this mine. That works out to approximately 634 tons per day. A fully loaded 10-wheel dump truck can legally haul 18 tons of material so it follows that about 35-40 trucks will be making round trips to this site each day. That mine should never have been permitted in the first place just based on the location, but to expand it is unacceptable. Trucks leaving the facility will have to come down off the hill on steep grades on 2 lane winding roads; the location is also on part of the historic Grand Prix road course and visitors to the North entrance to the State Park have to pass the mine entrance and will be sharing the road with those trucks., and it's only a matter of time before one of them loses its brakes.



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The DEIS does not mention the rollover crash of a gravel truck on Route 409 in February 2021. The truck flipped at the bottom of a long hill where Route 409 bends sharply, spraying gravel across a wide area 60 meters from Watkins Glen's busiest intersection. Heaven help us if it happens while a school bus full is dropping off our children or the shuttle bus full of tourists is travelling between the North and South entrances to the park.

Many of the concerns raised appear to be unmitigable and would therefore indicate a "no action" alternative must be evaluated, denying the permit outright. The no action alternative discussion in the DEIS is woefully inadequate, making specious claims of negative impacts to the local and regional economy and negatively affecting the construction industry. DEC should demand a robust analysis of the positive impacts of no action on, not only the economy, but tourism in general and especially the State Park, the viewshed, St Mary's cemetery and the residents in Watkins Glen and the Town of Dix living in close proximity to the gravel pit.

Regardless, we call on the DEC to give the public more time to review the application and to conduct a full, fair and exhaustive environmental review of the project prior to moving forward.

Respectfully submitted,

Yvonne Taylor
Joseph Campbell

Co-Founders-Seneca Lake Guardian