

May 12, 2014

Mr. David Coburn
Director Onondaga County Office of the Environment
John H. Mulroy Civic Center, 14th Floor
421 Montgomery Street
Syracuse, NY 13202

Director Coburn,

Thank you for inviting public comments on the draft scoping document and environmental assessment forms for the proposed amphitheater project. The County should abandon plans for the current site for the following reasons;

1. The site is a health hazard and unfit for public use.

The plan is to build on top of Solvay Wastebeds, a 300+ acre uncontrolled, open land fill where hazardous waste is piled to heights exceeding 60' above the lake. It is a site that features a long list of toxic chemicals mixed among untreated Solvay Waste, the Crucible Landfill, and Onondaga County and City of Syracuse's bio-solids sludge deposit. Polluted ground water leaches from the site directly into the lake. Heavy metal laden dust erodes from its surface and is blown about randomly by the wind. Extensive investigations performed under the direction of the US EPA, US FWS, and NYS DEC show the site is a public health hazard and is unfit for human use.

The USEPA described the site's health risk in the following way; "The non-cancer hazard comes primarily from inhalation of manganese. Because the source of manganese is unknown, EPA recommends ensuring off-trail use of the Site is effectively prohibited by fencing or other means.... For several chemicals (i.e., aroclor 1260, arsenic, barium, bens(a)anthracene, benz(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, dibenzo(a, h)anthracene, cadmium, copper, and mercury) the maximum detected concentration, as well as the calculated EPC, exceed both the restricted-residential and commercial New York State Soil Cleanup Objectives (see Appendix G). This information lends further weight to the need to prohibit off-trail usage of the Site." (USEPA Human Health Risk Assessment Onondaga Lake, Wastebeds 1-8 Site: Bike Trail Geddes, NY January 2009)

2. Activities at the proposed amphitheater are counterproductive to the plans to restore Onondaga Lake.

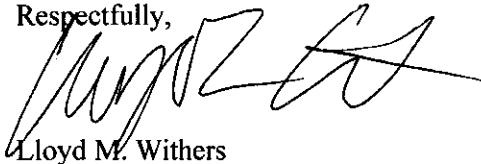
Crowds, noise, air and light pollution at the lakeshore will disturb wildlife, including insects, amphibians, reptiles, migratory birds, and mammals that occupy existing and planned wetlands adjacent to the site. Amplified noise and up to 20,000 thousand visitors per event is not appropriate activity near places designed to be protective of wildlife. The potential negative effect of 100+ decibel level concert performances on migrating waterfowl, Monarch Butterflies, and Bald Eagles, is obvious.

3. Onondaga Lake is a sacred site to the Onondaga Nation and Haudenosaunee.

Preserving Solvay Wastebeds 1-8 by building on top of them instead of removing them will serve to perpetuate their ongoing desecration of Onondaga Lake. The County should be respectful of the Onondaga Nation's Vision for Onondaga Lake which states, "The land will no longer be smothered by acres upon acres of waste." <http://www.onondaganation.org/land-rights/onondaga-nations-vision-for-a-clean-onondaga-lake/>

Thank you for your consideration.

Respectfully,



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