

**Citizens for a Better Plan**  
**Lakeview Amphitheater Project:**  
**Meeting SEQRA Obligations**

Before approving construction of the Lakeview Amphitheater, the County Legislature must fulfill specific legal obligations under the State Environmental Quality and Review Act (SEQRA). These duties include developing an Environmental Impact Statement (EIS) to help answer specific questions about the project's unavoidable environmental impacts and counterbalancing social or economic benefits. The current Draft EIS does not provide the information or analyses needed to meet this obligation. The County Legislature should require additional review to fulfill its SEQRA duties.

❖ **SEQRA Requires Careful Review of Environmental Impacts of, Mitigation for, and Alternatives to Government Actions.**

- SEQRA requires the County to identify and “take a hard look” at the possible environmental impacts of proposed projects, including impacts on land, air, water, vegetation, wildlife, habitat, and community character.
- Once environmental impacts are identified, SEQRA requires the County to identify and evaluate mitigation measures to reduce these impacts and alternative project designs or locations that might avoid them.

❖ **SEQRA Requires a Balancing of Environmental Impacts Against Other Benefits Based on Full Information.**

- SEQRA is designed to ensure that the County reaches an informed decision that **balances** unavoidable environmental impacts against economic and social benefits.
- The County must provide a **reasoned explanation** for its decision supported by the findings and analysis in the Final Environmental Impact Statement.
- Without an assessment of the project's economic and social benefits, the County cannot balance unavoidable impacts against benefits or judge whether the project's costs are outweighed by its positive impacts.

❖ **The County Has Not Met Its Obligation to Assess Project Costs and Benefits.**

- Understanding the immediate economic and social benefits of the proposed Amphitheater project requires an assessment of the market for the facility, likely annual revenues, construction costs, and annual operating costs. The County has not provided a business plan, estimate of revenues, or cost calculations.
- Understanding the broader social and economic benefits of the proposed Amphitheater project requires an assessment of the secondary economic benefits (i.e., additional meals, hotel rooms or gasoline bought in surrounding communities) and costs (i.e., additional emergency services or road maintenance provided by local communities). The County has not provided any information on secondary economic costs and benefits for this project.

## ❖ **The County Has Failed to Develop Concrete Mitigation Plans.**

- The County relies on many yet-to-be-developed planning and design documents to mitigate expected environmental impacts, including the site management plan, site remediation plan, stormwater management plan, and long-term traffic mitigation plan.
- Delaying development of mitigation measures means the County doesn't have the information to balance costs and benefits and the public doesn't have the opportunity for input required by SEQRA.

## ❖ **The County Has Failed to Consider a Reasonable Range of Alternatives.**

- The County considered only three alternatives: not building anything, building on a site that would obviously not support an amphitheater, or building the same facility in a slightly different configuration on this site.
- The County excluded reasonable alternatives, such as renovating the State Fair Grandstand or building on sites closer to Inner Harbor, by defining project goals as enhancing access to and taking advantage of remediation along the western shore of Onondaga Lake, rather than developing a viable concert venue.
- The County failed to consider alternative uses for this site, such as an environmental education center, or alternative designs, like a smaller facility, that meet project goals.

## **WHAT CAN I DO?**

### **SUBMIT COMMENTS BY SEPTEMBER 5, 2014**

#### **ASK THE COUNTY TO MEET ITS SEQRA OBLIGATIONS BY:**

- Developing and releasing a business plan and estimate of construction costs so that the economic and social benefits of the project can be considered.
- Developing more complete mitigation measures and a reasonable range of alternatives, including sites that are not along the lakeshore.
- Postponing any decisions on the DEIS until the additional analysis is complete and the public has had sufficient time to review it.

#### **Email your comments to:**

- David Coburn, Onondaga County Office of the Environment, [DavidCoburn@ongov.net](mailto:DavidCoburn@ongov.net)
- Ryan McMahon, Onondaga County Legislature Chairman, [jryanmcmahon@gmail.com](mailto:jryanmcmahon@gmail.com)
- Mike Plochocki, Onondaga County Legislature Environmental Protection Committee Chairman, [mikeplochocki@hotmail.com](mailto:mikeplochocki@hotmail.com)

#### **Please also call or email your County Legislator:**

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