Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community.

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already
overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

**Economic and safety issues:**

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?

How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?
Is Inergy's economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy's economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

Ecological and other issues:

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can't we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.
Doubts about the company Inergy and their plan:

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual’s property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

The next logical step:

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

Your name

[Signature]

RECEIVED
SEP 27 2011
DEP-REGION 8
Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community.

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

Economic and safety issues:

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of
Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?

How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?
Ecological and other issues:

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.

Doubts about the company Inergy and their plan:

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many
salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy's Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan's Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual's property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy's "proprietary claims."

**The next logical step:**

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA. As a Registered Nurse, I am very concerned about the impact on our environment and people's health.

Thank you for considering my concerns and suggestions,

Beth Cain
42 N Glenora Road
Dundee, NY 14837

9/27/11
David L. Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
6274 East Avon-Lima Road  
Avon, New York 14414-9516

Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community.

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already
overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

**Economic and safety issues:**

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?

How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?
Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

Ecological and other issues:

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.
Doubts about the company Inergy and their plan:

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual’s property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

The next logical step:

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

Elaine Mansfield
Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community.

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development
in our state. The result will be an out-of-state company doing as they please with the environment of our area.

**Economic and safety issues:**

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?

How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?
Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

Ecological and other issues:

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.
Doubts about the company Inergy and their plan:

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual’s property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

The next logical step:

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

Donna Lucent, Owner  
Pompous Ass Winery  
Rock Stream, NY
David L. Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
6274 East Avon-Lima Road  
Avon, New York 14414-9516

Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community.

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already
overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

**Economic and safety issues:**

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?

How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?
Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

Ecological and other issues:

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.
Doubts about the company Inergy and their plan:

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual’s property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

The next logical step:

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

Robert and Susan Gould
David L. Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
6274 East Avon-Lima Road  
Avon, New York 14414-9516

Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community.

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development
in our state. The result will be an out-of-state company doing as they please with the environment of our area.

**Economic and safety issues:**

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?

How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?
Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

**Ecological and other issues:**

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.
Doubts about the company Inergy and their plan:

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual’s property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

The next logical step:

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

Margaret Fry Keating
3970 County Road 2
Hector NY 14841
Echoes of the Glen Bed & Breakfast  
300 South Franklin Street  
Watkins Glen, NY 14891  
September 27, 2011

David L. Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
6274 East Avon-Lima Road  
Avon, New York 14414-9516

Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY  
(DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the winter time? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

We own a Bed & Breakfast on Franklin Street in Watkins Glen. We do just as much business in September and October (or more) as July and August. We have business all winter long because people come to enjoy the wineries and winter sports in our area. Our business will not survive if we have four more tractor trailers traveling down Franklin Street every 15 minutes. We have a lot of return business at our B&B. Guests will not stay a second time due to the increased truck traffic as the truck traffic takes away from that “small town” atmosphere. We grew up in this area and moved back here because of our love of Seneca Lake. Inergy will take away the beauty of why people move back home to the area, as many have done in the past 10 years.

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.
Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community.

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

**Economic and safety issues:**

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of flammable material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?
How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

Ecological and other issues:

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.
Doubts about the company Inergy and their plan:

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual’s property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

The next logical step:

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

Barbara A. Merrill
David L. Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
6274 East Avon-Lima Road  
Avon, New York 14414-9516

Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community.

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already
overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

Economic and safety issues:

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?

How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?
Is Inergy's economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy's economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

Ecological and other issues:

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can't we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.
Doubts about the company Inergy and their plan:

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual’s property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

The next logical step:

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

Paul and Dale Richards
David L. Bimber
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414-9516

Sept. 25, 2011

Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere.
because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community.

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

**Economic and safety issues:**

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?

How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic
District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

**Ecological and other issues:**

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.

**Doubts about the company Inergy and their plan:**
Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual’s property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

The next logical step:

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions.

Sincerely,

Bertrand Salmirs

(e-mail: bbsalmirs@htva.net)
August 26, 2011

David L. Bimber
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414-9516
Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the
negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community.

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

Economic and safety issues:

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion
of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?

How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy's economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy's economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

**Ecological and other issues:**

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from
permeability into the lake from salt caverns, can't we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.

Doubts about the company Inergy and their plan:

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.
What are the long term, cumulative effects of Inergy's planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy's Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan's Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual's property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy's "proprietary claims."

The next logical step:

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

Cindy Stillman
Cindy Stillman
CAS@cornell.edu
Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

In addition to the comments listed below, I would like to stress that those of us living as far north in Geneva, New York will also feel the impacts in increased traffic from trucks, trains as well as the dangers associated with parking of trains full of natural gas in the City along our beautiful lake front. Recent fire accidents of similar trains necessitated the evacuation of thousands of people this summer.

Also, those of us businessmen involved in the tourism industry feel threatened from the industrialization of our pristine agricultural tourism area.

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is
located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community.

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

**Economic and safety issues:**

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?
How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

**Ecological and other issues:**

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?
Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.

**Doubts about the company Inergy and their plan:**

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual’s property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

**The next logical step:**

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

Daniel Belliveau
Finger Lakes Hospitality

95 Lafayette Avenue
Geneva, New York 14456
Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community.
I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

**Economic and safety issues:**

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?

How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be
a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

**Ecological and other issues:**

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.
Doubts about the company Inergy and their plan:

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual’s property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

The next logical step:

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

Erica Naylor
September 27, 2011

David L. Bimber
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414-9516

Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is
located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community.

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

**Economic and safety issues:**

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?
How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

Ecological and other issues:

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?
Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.

Doubts about the company Inergy and their plan:

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual’s property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

The next logical step:

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

Marie Holmes
David L. Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
6274 East Avon-Lima Road  
Avon, New York 14414-9516

Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County.

It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry not frighten prospective growth away.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values, with a negative fiscal impact on the region’s property tax base. Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community.

With the massive budget cuts at the DEC, you are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.
Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure?

Since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by?

To repeat, How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area?

Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? The DEC should demand a more in-depth study on Inergy’s economic claims. Why not make financial investments into renewable Green Energy?

Since there is some evidence that a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

A brine pond on the a hillside overlooking Seneca Lakeside can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

What about the ecological health of nearby wetlands?

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?
Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal which deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

We understand that they do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas and taken individual’s property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

The next logical step:

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

As an agency charged with the welfare of public health and safety, it is imperative that these obligations be fulfilled.

Barbara A. Hegeman

This letter has been very detailed to make sure you don't overlook any of the important facts.
September 29, 2011.

David L. Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
6274 East Avon-Lima Road  
Avon, New York 14414-9516

Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community. A balancing test should be conducted to compare the growth inducing aspects of this project to the negative economic aspects that this facility will impose on our wine, agriculture and tourism industry.
I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

**Economic and safety issues:**

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?

How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be
a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

**Ecological and other issues:**

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.
Doubts about the company Inergy and their plan:

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual’s property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

The next logical step:

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

Your name

Lori + Frederick Lawrence
From: Fran Willis

<franwillis@me.com>
To: <dlbimber@gw.dec.state.ny.us>
Date: 9/29/2011 1:05 PM
Subject: finger lakes storage

71 Hunt Rd.

Stream, NY 14878

September 29, 2011

David L. Bimber
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414-9516

Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?
Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community. A balancing test should be conducted to compare the growth inducing aspects of this project to the negative economic aspects that this facility will impose on our wine, agriculture and tourism industry.

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

Economic and safety issues:

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?
What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?

How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

Ecological and other issues:

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wfng, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?
On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.

Doubts about the company Inergy and their plan:

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy's planned expansion? There is a disparity between
what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy's Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan's Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual's property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy's "proprietary claims."

The next logical step:

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

Frances Willis
Dundee Scottish Festival
of the Finger Lakes
Manager
franwillis@me.com
David L. Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
6274 East Avon-Lima Road  
Avon, New York 14414-9516

Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community.

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.
Economic and safety issues:

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?

How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the
potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

**Ecological and other issues:**

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.

**Doubts about the company Inergy and their plan:**
Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual’s property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

The next logical step:

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

Your name
Barbara Cook
Watkins Glen NY
2475 Altay Road  
Rock Stream, NY 14878  
September 29, 2011

David L. Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
6274 East Avon-Lima Road  
Avon, New York 14414-9516

Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community. A balancing test should be conducted to compare the growth inducing aspects of this project to the negative economic aspects that this facility will impose on our wine, agriculture and tourism industry.
I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

**Economic and safety issues:**

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

I am also concerned with the increased chances of fatalities that could occur between trucks and our local Amish/Mennonite communities who use either horse and buggy or bicycles to travel. There is a very large community along Route 14A and 14. The thought of one of their children being blown over by a semi-truck as it speeds along and being seriously injured is frightening.

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been
studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?

How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

**Ecological and other issues:**

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has
not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.

**Doubts about the company Inergy and their plan:**

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual’s property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

**The next logical step:**

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

Gitanjali Devi
Owner – The Ginger Cat Bed & Breakfast, located in the town of Reading
www.gingercat-bb.com - 607.535.9627
From: "Ezra L." <lencere@gmail.com>
To: <dlbimber@gw.dec.state.ny.us>
Date: 9/29/2011 4:38 PM
Subject: LPG storage near Seneca Lake

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when "there is no tourism in the area." Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region's economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region's property tax base. As you can see, Inergy facility's proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community. A balancing test should be conducted to compare the growth inducing aspects of this project to the negative economic aspects that this facility will impose on our wine, agriculture and tourism.
industry.

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don't have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

*Economic and safety issues:*

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn't it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn't such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a "bowl" shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?
What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?

How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

* * *

*Ecological and other issues:*

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?
Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can't we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.

* * *

*Doubts about the company Inergy and their plan:*

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?
Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy's planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy's Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan's Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual's property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy's "proprietary claims."

*The next logical step:*

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,
Ezra Lencer
108 Buffalo st., Apt. 2
Ithaca NY, 14850
29 September 2011
7 Sunny Knoll
Ithaca, NY 14850
September 29, 2011

David L. Bimber
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414-9516

Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, N.Y. leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community. A balancing test should be conducted to compare the growth inducing aspects of this project to the
negative economic aspects that this facility will impose on our wine, agriculture and tourism
industry.

I am most concerned that with the massive budget cuts at the DEC. The DEC does not have the
expertise or trained personnel to watch over this facility despite its positive intentions. The
agency is already overwhelmed and doesn’t have adequate staff to handle other proposed gas
industry development in our state. The result will be an out-of-state company doing as they
please with the environment of our area.

Economic and safety issues

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck
traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main
streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures
with other types of hydrocarbon storage, are our small local fire departments expected to deal
with catastrophic failure at this facility? Who will pay for training and equipment needed? Is
our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such
a facility near a highly populated town that would have to be evacuated in a major failure?
Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake
shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is
heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the
impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility?
Will any fires or explosions that ignite at the gas storage facility be magnified if they come into
contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our
crops and agriculture? Will these trucks or any portion of the Inergy proposal, including
pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying
thousands of gallons of highly explosive LPG traveling over miles of track near residences and
also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the
trains plan to use is in poor condition and is unsafe for transport of explosive material. Have
security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity
felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and
the gas stored within the caverns so close by? How adequately have these fault lines been
studied? The application to store spent nuclear rods in these caverns was denied due to these
fault lines. Why then is storing LPG in these same caverns being considered?
How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

**Ecological and other issues**

Is the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley being seriously studied?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Is the DEC addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to U.S. Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?
Has the DEC adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.

**Doubts about the company Inergy and their plan**

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long-term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. The company does not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual’s property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

**The next logical step**

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

Sincerely,

Zorika Henderson
Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community.

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development
in our state. The result will be an out-of-state company doing as they please with the environment of our area.

**Economic and safety issues:**

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?

How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?
Is Inergy's economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy's economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

**Ecological and other issues:**

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can't we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.
Doubts about the company Inergy and their plan:

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual’s property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

The next logical step:

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

Gudrun Schlieff
5873 Rte 414
Hector, NY
14841
Beth Jelsma Ph.D.
75 Newcastle Rd.
Rochester NY 14610

Sept. 28, 2011

David L. Bimber
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414-9516

Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community.
I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

Economic and safety issues:

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?

How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be
a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

Ecological and other issues:

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.
Doubts about the company Inergy and their plan:

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual’s property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

The next logical step:

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

[Signature]

Your name
From: "Ann and Marvin"<annvan@rochester.rr.com>
To: <dlbimber@gw.dec.state.ny.us>
Date: 10/1/2011 10:55 PM
Subject: Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

David L. Bimber
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414-9516

Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the public health, environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when "there is no tourism in the area." Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak? Should residents who live here year round have to suffer the consequences of increased truck traffic (road deterioration, accidents, noise, smell, pedestrian peril, etc.).

Compatible businesses and industry have postponed plans to develop or are selling before their
businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region's economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region's property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community. A balancing test should be conducted to compare the growth inducing aspects of this project to the negative economic aspects that this facility will impose on our wine, agriculture and tourism industry. It is not just a matter of the “science” of the proposal, but very seriously a matter of our quality of life.

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

Economic and safety issues:

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?
What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?

How will this facility affect local property values and the tax base-on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy's economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy's economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote, farther away from residences, and on a flatter terrain?

Ecological and other issues:

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can't we assume that LPG and butane will seep into the lake? Are you addressing this?
On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.

Doubts about the company Inergy and their plan:

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy's planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not
mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy's Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan's Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual's property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy's "proprietary claims."

The next logical step:

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Recently the watersheds of Syracuse and NYC were awarded protection that the entire Finger Lakes watershed deserves. Whether our drinking water is filtered or not, we deserve the most careful scrutiny to protect one of our most valuable commodities for now and for the future.

Thank you for considering my concerns and suggestions,

Ann van der Meulen

132 Washington St.

Geneva, NY 14456
From: Cherry Rahn

<cherryrahn@yahoo.com>
To: "dlbimber@gw.dec.state.ny.us" <dlbimber@gw.dec.state.ny.us>
Date: 10/2/2011 3:57 PM
Subject: gas storage comment

16 Jay St, Geneva, NY

David L. Bimber
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414-9516

Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when "there is no tourism in the area." Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region's economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease...
property values. In turn, this will have a negative fiscal impact on the region's property tax base. As you can see, Inergy facility's proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community. A balancing test should be conducted to compare the growth inducing aspects of this project to the negative economic aspects that this facility will impose on our wine, agriculture and tourism industry.

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don't have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

Economic and safety issues:

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn't it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn't such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a "bowl" shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the
There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?

How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

Ecological and other issues:

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the
brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.

Doubts about the company Inergy and their plan:

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual’s property through eminent domain for their own profit and expansion.
There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy's "proprietary claims."

The next logical step:

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

Cherry Rahn
David L. Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
6274 East Avon-Lima Road  
Avon, New York 14414-9516

Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community.
I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

**Economic and safety issues:**

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?

How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be
a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

**Ecological and other issues:**

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.
Doubts about the company Inergy and their plan:

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual’s property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

The next logical step:

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

Marijo Foster
David L. Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
6274 East Avon-Lima Road  
Avon, New York 14414-9516

Joy E. Schank  
3013 Wood Road  
Himrod, NY 14842

9/26/11

Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community.
I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

**Economic and safety issues:**

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?

How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be
a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

Ecological and other issues:

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.
Doubts about the company Inergy and their plan:

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual’s property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

The next logical step:

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

Joy E. Schank
Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when "there is no tourism in the area." Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community.

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development.
in our state. The result will be an out-of-state company doing as they please with the environment of our area.

**Economic and safety issues:**

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a "bowl" shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will be the impact in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?

How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?
Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

**Ecological and other issues:**

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.
Doubts about the company Inergy and their plan:

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual’s property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

The next logical step:

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

Your name

[Signature]
Michael W. Schank  
3862 Castle Point Road  
Himrod, NY 14842  

9/30/2011  

Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when "there is no tourism in the area." Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing businesses and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region's economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region's property tax base. As you can see, Inergy facility's proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community. A balancing test should be conducted to compare the growth inducing aspects of this project to the
negative economic aspects that this facility will impose on our wine, agriculture and tourism industry.

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don't have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

Economic and safety issues:

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn't it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn't such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?
How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

Ecological and other issues:

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?
Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.

**Doubts about the company Inergy and their plan:**

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual’s property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

**The next logical step:**

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

Michael W. Schank
David L. Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
6274 East Avon-Lima Road  
Avon, New York 14414-9516

Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community. A balancing test should be conducted to compare the growth inducing aspects of this project to the negative economic aspects that this facility will impose on our wine, agriculture and tourism industry.
I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

**Economic and safety issues:**

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure?

Shall we create such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?

How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be
a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

**Ecological and other issues:**

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.
Doubts about the company Inergy and their plan:

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy's planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy's Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan's Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual's property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

The next logical step:

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions, We are particularly concerned because we are long-time owners of two properties in the Town of Reading. Both are within two miles of the proposed gas storage facilities! One of them is our lake side summer home.

Sincerely,

Charles F. Darling

Martha Darling

Charles & Martha Darling
Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community.
I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

**Economic and safety issues:**

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?
How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

Ecological and other issues:

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from
drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.

**Doubts about the company Inergy and their plan:**

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual’s property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

**The next logical step:**

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is
worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

Siegfried & Helga Poreda
From: Ayne <Ayne99@yahoo.com>
To: "dlbimber@gw.dec.state.ny.us" <dlbimber@gw.dec.state.ny.us>
Date: 10/3/2011 10:19 PM
Subject: Proposed finger Lakes LPG Storage Facility

Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when "there is no tourism in the area." Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region's economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region's property tax base. As you can see, Inergy facility's proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community. A balancing test should be conducted to compare the growth inducing aspects of this project to the negative economic aspects that this facility will impose on our wine, agriculture and tourism industry.

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don't have adequate staff to...
handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

Economic and safety issues:

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?

How will this facility affect local property values and the
tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

Ecological and other issues:

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if
not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.

Doubts about the company Inergy and their plan:

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual’s property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

The next logical step:

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that
this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

Ayne Sheldon
From: Michael Maxwell <mgmax@stny.rr.com>
To: <dlbimber@gw.dec.state.ny.us>
Date: 10/3/2011 8:33 PM
Subject: Comments Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)
Attachments: CopyofMaxwellDECCommentLetter.doc.pdf

Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)
PDF Attached
Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY creates many concerns about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

I am respectfully offering for consideration that a Qualitative and Quantitative Risk Analysis (QRA) be done in order to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis, and Inergy should pay for it. If the project is worth the risk, the company should have nothing to fear from a QRA.

Ecological and Safety Issues:

I live near the western shore of Seneca Lake and routinely hear traffic noise, as well as music and voices from the restaurants and wineries from across the lake on the other shore. The impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley bears very careful consideration.

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, we cannot assume that LPG and butane will not seep into the lake.

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. There are legitimate concerns about the porosity and permeability of the soil beneath and around the brine pond. Recent torrential rains and catastrophic flooding raise very genuine concerns about the possibility of a brine leakage and the subsequent contamination of the water table.
Relative to that, consider that there are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, there must be concern about the impact of an earthquake involving those fault lines and the gas stored within the caverns. The application to store spent nuclear rods in these caverns was denied due to these fault lines. It doesn’t make logical sense that storing LPG or natural gas in these same caverns would be any safer. I have been unable to locate any historical documentation that indicates Inergy’s experience in building and safely managing facilities of this type and size from the ground up. Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

There are more inherent risks building a brine pond on a steep hillside than on a flat location. The lakeshores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, there exists the possibility for a vapor fog to form and sink over the lake. I have been unable to locate any plan by Inergy that addresses the impact of this potential scenario, or any kind of evacuation plan in the event of such an incident.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. I don’t understand how a risk of this magnitude could be justified. I think it is unconscionable.

Catastrophic failures of salt cavern hydrocarbon storage have been documented more often than failures with other types of hydrocarbon storage. I have been unable to find evidence of any comprehensive plan by Inergy that addresses a catastrophic failure at this facility. I imagine there must be some risk associated with hydrocarbon storage next to a compressed air storage facility. It seems plausible that coming into contact with the compressed air stored nearby could magnify any fires or explosions that ignite at the gas storage facility. It would appear that this responsibility would then fall upon our small local volunteer fire departments, who don’t have the equipment, manpower or training to deal with a large scale environmental crisis. An industrial catastrophe of any magnitude would quickly overwhelm our small local hospital. It seems outright reckless and irresponsible to put such a facility near a highly populated town that would have to be evacuated in the event of a major failure. Such a site should be located in a less populated area.

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. I have found nothing that indicates how this facility might impact the recently established Bald Eagle, the ecological health of nearby wetlands. An independent study should be undertaken and completed over several seasons.

I have been unable to find that any independent archaeological survey on unexplored Seneca Indian sites has ever been completed. This must be done to determine whether there are any
archaeologically sensitive sites. I find no evidence whatsoever that references this in any of the Inergy documents.

There are many unanswered questions relative to the costs of maintaining roads that will have increasing amounts of heavy truck traffic and who will pay for this. Without clear parameters, this responsibility falls on local taxpayers. The main streets of the village of Watkins Glen are already congested with truck traffic, and are unable to handle additional heavy traffic and pollution.

It seems inevitable that volatile organic compounds produced by increased diesel truck traffic will have an adverse effect on our crops, agriculture and ecosystem. The adjoining county, Yates County, is the highest producing agricultural county in New York State. It would seem that additional pipelines, industrial pollution, increased rail and truck traffic, and the threat to the water cycle would all have a negative impact on irreplaceable Grade A farmland.

As part of the application process, Inergy should be required to file a comprehensive plan that spells out in detail, security measures for the 24-32 rail cars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge. The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. I have seen nothing about security measures for the pipelines or off-site aspects of the project.

**Economic Issues:**

This proposed project could have a devastating effect on the area’s tourism industry. This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side.

Inergy states that propane delivery begins in August. It continues through autumn months in this region, when tourism is at its peak. Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” There has been a tremendous growth of tourism in the area during the winter months. If this becomes “the distribution hub of the northeast” and if Inergy is allowed to continue with it’s ultimate plan of integrating this project with the hydrofracturing of natural gas from the Marcellus Shale, this could doom the tourism industry in this area. A few industrial jobs that may not go to local people cannot replace the loss of hundreds of other jobs if the tourism industry is adversely impacted.

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the
region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community. It seems that this facility will adversely affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility. I can’t imagine that added traffic and industrial activity won’t adversely affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Inergy’s economic claims that home heating costs will go down for upstate New Yorkers. It is my belief that much of the natural gas from the Marcellus Shale will go through this facility to be pipelined out and away from this area. Our beautiful region stands to become the staging area for distribution and is not in line to reap any of the so-called benefits that Inergy is touting. The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. I don’t understand the need for Inergy to construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote, farther away from residences, and on a flatter terrain.

**Doubts about the company Inergy and their plan:**

I am most concerned about the long term, cumulative effects of Inergy’s planned expansion. There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. Conflicting statements made on their website, to their investors, to the public and to the DEC seem to point toward a hidden agenda, involving many salt mines and a growing industrial facility fully integrated with the Marcellus Shale operations. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individuals’ property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

I am also very concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staffing to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.
In closing, I respectfully reiterate my request to have an independent Qualitative and Quantitative Risk Analysis (QRA) in order to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. It seems only fair that local governments and residents should choose the people who make this risk analysis and that it be paid for by Inergy. I The importance of investing the necessary time and effort to thoroughly and fully assess the complex and far reaching ramifications of a project of this magnitude cannot be overstated.

Thank you for considering my concerns and suggestions,

Michael G. Maxwell
97 Fir Tree Point Road
Rock Stream NY 14878
607-243-8967
michaelgillanmaxwell@gmail.com
From: Jim Curatolo <jac3@htva.net>
To: <dlbimber@gw.dec.state.ny.us>
Date: 10/3/2011 8:20 PM
Subject: gas storage comments
Attachments: DEC comments James Curatolo.doc

James Curatolo
4729 State Route 414
Burdett, NY 14818
607-546-2528 (phone/fax)
607-765-4780 (cell)
u-s-c.org
James Curatolo  
4729 State Route 414  
Burdett, NY 14818

David L. Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
6274 East Avon-Lima Road  
Avon, New York 14414-9516

Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community. A balancing test should be conducted to compare the growth inducing aspects of this project to the negative economic aspects that this facility will impose on our wine, agriculture and tourism industry.
I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

**Economic and safety issues:**

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?

How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be
a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy's economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy's economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

Ecological and other issues:

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can't we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.
Doubts about the company Inergy and their plan:

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual’s property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

The next logical step:

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

James Curatolo
Several other issues:

1. What about the waterfowl, shorebirds and amphibians who may attempt to use the 14 acre pond, (which is highly toxic)? What is the mitigation?

2. Should the dam breach the salt content of the water where the flow enters the lake will be extremely high and will that not cause a huge fish kill?

3. Propane is heavier than air. If there is a major failure, it will flow down the hill and when it finally is dispersed by wind it will reach sufficient dilution to explode, yes? What is the containment plan?

4. The EIS says that no dam permit is needed. How can that possibly be? The dam height and capacity is well beyond the "no permit needed" DEC guidelines, Correct?

5. Why is another location even one mile removed from the lake with a pipeline to transport the propane and salt brine to the site not considered?
From: Elisa Evett <duccio44@gmail.com>  
To: <dlbimber@gw.dec.state.ny.us>  
Date: 10/4/2011 7:25 AM  
Subject: LPG gas storage facility in Reading, NY

Dear Mr. Bimber,

Although I do not live in the immediate vicinity of Reading, New York, the proposed site for Inergy's LPG storage facility, I live in the "neighborhood" in the township of Caroline in Tompkins County where 55% of the land has been leased to natural gas companies and so, what happens in Reading is closely linked to what happens in my town. I am very concerned about the likely disastrous effects of the gas industry, in all of its ramifications, on the entire region.

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when "there is no tourism in the area." Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region's economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region's property tax base. As you can see, Inergy facility's proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community. A balancing test should be conducted to compare the growth inducing aspects of this project to the negative economic aspects that this facility will impose on our wine, agriculture and tourism industry.

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don't have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

Economic and safety issues:

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other
types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn't it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn't such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a "bowl" shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?

How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy's economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy's economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

Ecological and other issues:

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can't we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without...
potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas stored in the caverns will also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.

Doubts about the company Inergy and their plan:

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy's planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy's Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan's Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual's property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy's "proprietary claims."

The next logical step:

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,
Elisa Evett
298 Bald Hill Rd.
Brooktondale, NY 14817
From: Matthew Glenn <maglenn_1999@yahoo.com>
To: <dbimber@gw.dec.state.ny.us>
Date: 10/4/2011 6:24 PM
Subject: LPG facility comments

Matthew Glenn  
Muddy Fingers Farm  
3859 Dugue Rd.  
Hector, NY 14841  
October 4, 2011

David L. Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
6274 East Avon-Lima Road  
Avon, New York 14414-9516

Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility, with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will
continue to negatively impact the character of our community. A balancing test should be conducted to compare the growth inducing aspects of this project to the negative economic aspects that this facility will impose on our wine, agriculture and tourism industry.

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

Economic and safety issues:

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?
How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

Ecological and other issues:

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can't we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.
Doubts about the company Inergy and their plan:

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy's planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy's Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan's Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual's property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy's "proprietary claims."

The next logical step:

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,
October 1, 2011

David L. Bimber
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414-9516

Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community. A balancing test should be conducted to compare the growth inducing aspects of this project to the
negative economic aspects that this facility will impose on our wine, agriculture and tourism industry.

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

Economic and safety issues:

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?
How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

Ecological and other issues:

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?
Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.

**Doubts about the company Inergy and their plan:**

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual’s property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

**The next logical step:**

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

[Signature]

Carol Richardson
Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

While the following is a form letter, I can only say that it is unconscionable and inhumane to put our lives, livelihoods and community at risk in this way. While I reside in Ithaca where we have our own issues, I am VERY invested in the Seneca community, spend a great deal of time there over thirty years and am looking forward to moving over in the future if this egregious nightmare can be stopped.

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is
located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community.

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

**Economic and safety issues:**

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?
How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

Ecological and other issues:

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicity associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?
Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.

**Doubts about the company Inergy and their plan:**

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual’s property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

**The next logical step:**

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

Debra A. Martens
Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community. A balancing test should be conducted to compare the growth inducing aspects of this project to the
negative economic aspects that this facility will impose on our wine, agriculture and tourism industry.

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

Economic and safety issues:

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?
How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

**Ecological and other issues:**

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?
Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.

**Doubts about the company Inergy and their plan:**

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, **NOT** storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual’s property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

**The next logical step:**

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

Carolyn Bayer-Broring
Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community. A balancing test should be conducted to compare the growth inducing aspects of this project to the
negative economic aspects that this facility will impose on our wine, agriculture and tourism industry.

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

Economic and safety issues:

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?
How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

**Ecological and other issues:**

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?
Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.

Doubts about the company Inergy and their plan:

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy’s planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy’s Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan’s Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual’s property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy’s “proprietary claims.”

The next logical step:

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

Thomas E. Broring
Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact...
the character of our community. A balancing test should be conducted to compare the growth inducing aspects of this project to the negative economic aspects that this facility will impose on our wine, agriculture and tourism industry.

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don't have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

Economic and safety issues:

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?

What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a “bowl” shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to
these fault lines. Why then is storing LPG in these same caverns being considered?

How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy’s economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy’s economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote; farther away from residences, and on a flatter terrain?

Ecological and other issues:

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle?

What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale.
Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.

Doubts about the company Inergy and their plan:

Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy's planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy's Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan's Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual's property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy's "proprietary claims."

The next logical step:

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

Erin E. Rourke
Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

I am writing to you because of my deep concern that the DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves so many doubts about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is very difficult to see sufficient short or long-term benefits to the local area that can offset the massive costs to our local population and risks to our environment and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This is a finite resource that has an end point when they have been exhausted. Will the short-term gains outweigh the irreparable losses to the local economy and ecology?

I understand this environmentally disruptive industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?
One argument of Inergy’s claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak?

Compatible businesses and industry have postponed plans to develop or are selling before their businesses are impacted by the Inergy facility. There is a need to preserve existing business and promote industry that can coexist and enhance what we already have in this region, not frighten prospective growth away. The Inergy facility with its associated noise, traffic, and few jobs does not offer enough positives to balance out the negative impact on the region’s economy.

Homeowners are selling and delaying remodeling plans while prospective buyers are looking elsewhere because they fear that investing in an area where a gas storage and transport facility is located will decrease property values. In turn, this will have a negative fiscal impact on the region’s property tax base. As you can see, Inergy facility’s proposal is already having a negative impact, and if approved will continue to negatively impact the character of our community. A balancing test should be conducted to compare the growth inducing aspects of this project to the negative economic aspects that this facility will impose on our wine, agriculture and tourism industry.

I am most concerned that with the massive budget cuts at the DEC, you do not have the expertise or trained personnel to watch over this facility despite your positive intentions. You are already overwhelmed and don’t have adequate staff to handle other proposed gas industry development in our state. The result will be an out-of-state company doing as they please with the environment of our area.

*Economic and safety issues:

Who is responsible for maintaining the roads that will have increasing amounts of heavy truck traffic? Who will pay for this? Local taxpayers, I assume. How will the already congested main streets of Watkins Glen deal with added traffic and pollution?

Since catastrophic failures of salt cavern hydrocarbon storage happen more often than failures with other types of hydrocarbon storage, are our small local fire departments expected to deal with catastrophic failure at this facility? Who will pay for training and equipment needed? Is our small local hospital equipped to handle an industrial catastrophe? Isn’t it foolish to put such a facility near a highly populated town that would have to be evacuated in a major failure? Shouldn’t such a site be in a less populated area?
What are the risks of building this facility on a steep hillside versus a flat location? The lake shores and water create a "bowl" shape. In the event of an accidental release, and since LPG is heavier than air, what are the risks if a vapor fog forms and sinks over the lake? What will the impact be in this scenario, and is there an evacuation plan in place?

What are the risks associated with hydrocarbon storage next to a compressed air storage facility? Will any fires or explosions that ignite at the gas storage facility be magnified if they come into contact with the compressed air stored nearby?

What impact will the volatile organic compounds produced by the diesel trucks have on our crops and agriculture? Will these trucks or any portion of the Inergy proposal, including pipeline, impact Grade A farmland?

What kind of security measures have been established for the 24-32 railcars per day carrying thousands of gallons of highly explosive LPG traveling over miles of track near residences and also over a bridge across our beautiful Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for transport of explosive material. Have security measures been established for the pipelines or off-site aspects of the project?

There are fault lines on the Western shore of Seneca Lake. In light of the recent seismic activity felt in Watkins Glen, what would be the impact of an earthquake involving those fault lines and the gas stored within the caverns so close by? How adequately have these fault lines been studied? The application to store spent nuclear rods in these caverns was denied due to these fault lines. Why then is storing LPG in these same caverns being considered?

How will this facility affect local property values and the tax base—on the lake, near the facility, and along the roads leading to the facility? How will added traffic and industrial activity affect tourist businesses in the area? Franklin Street, the main street in Watkins Glen, has applied to be a Historic District. How can added LPG truck traffic coexist with a historic site designation? How much more traffic can the retail shops and homes on Franklin Street withstand?

Is Inergy's economic claim true that home heating costs will go down for upstate New Yorkers? If so, by how much? Where are the details? Will any lowering of local gas prices be worth the potential negative impacts and risks? The DEC should demand a more in-depth study on Inergy's economic claims.

While there may be a need for propane/gas storage in the region, this is not the appropriate site for this facility. Why must Inergy construct this facility in a world-class tourist destination, as opposed to placing it somewhere more remote, farther away from residences, and on a
flatter terrain?

*Ecological and other issues: *

Are you seriously considering the impact of noise (truck, rail, compressors, flares and other industrial activity) in a lake region where small sounds reverberates across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) that points toward a higher salt content existing in Seneca Lake from permeability into the lake from salt caverns, can’t we assume that LPG and butane will seep into the lake? Are you addressing this?

On top of the aesthetic damage to a pristine hillside overlooking Seneca Lake, a brine pond on the side of a hill can spill or leak into the lake and local water sources, leaving the village and local residents without potable water. The water table is very high where the proposed brine pond is to be located. How porous or permeable is the soil beneath the brine pond? In the event of a brine leakage, how long would it take for the brine to contaminate the water table?

According to a paper submitted to US Fish and Wildlife, there is high morbidity and toxicology associated with salt water and migratory birds and waterfowl. The impact of the brine pond to our migratory birds and waterfowl, including the threatened loon, is not adequately addressed in the dSEIS. How would this facility impact the recently established Bald Eagle? What about the ecological health of nearby wetlands? The dSEIS suggests that since our wetlands are small, no impact or mitigation measures are required, but there is no reason to claim this. The dSEIS does not adequately assess the flora and fauna at the site. An independent study should be undertaken and completed over several seasons.

Gas produced from the Marcellus Shale contains some of the toxins used in its extraction. Some, if not all, of the propane, butane, and natural gas stored in the salt caverns will come from drilling in the Marcellus Shale. Toxins from the gas could also leak into our lake. The DEC has not adequately addressed this issue. Seneca Lake is a Class AA drinking water resource for over 100,000 people. Why take such a risk?

Have you adequately dealt with the impact on unexplored Seneca Indian sites? No independent archeological survey was completed. This must be done to determine whether there are any archeologically sensitive sites.

*Doubts about the company Inergy and their plan:*
Inergy does not have experience building a facility of this type and size from the ground up. Do we want them experimenting on us?

Inergy largely relies on the 1992 GEIS for information in their proposal. This GEIS deals with hydraulic drilling of vertical wells, NOT storage of LPG in salt mines.

What are the long term, cumulative effects of Inergy's planned expansion? There is a disparity between what they tell us in the dSEIS compared to what they are telling investors. In the dSEIS, they do not mention expansion, although their investors are told that Inergy wants to make this the major distribution facility for the Northeastern United States. They have big hidden plans, involving many salt mines and a growing industrial facility. Once this initial permit application is approved, they will expand and increase their negative effects on our community. The DEC should investigate the full expansion plans listed in Inergy's Initial Public Offering to investors and demand full-disclosure from Inergy.

The character of this company is questionable and needs to be fully considered. They do not have our local interests in mind. Instead they are working purely on a profit motive. Inergy was sued by the State of Michigan's Attorney General for price gouging. They have had accidents and been fined in other areas. They have taken individual's property through eminent domain for their own profit and expansion.

There are many issues still not addressed and disclosed in the dSEIS. This document should be a full disclosure to the DEC and the public. Demand that full disclosure be met, regardless of Inergy's "proprietary claims."

*The next logical step:*

Considering the obvious threat this project brings, it is only reasonable to have an independent Qualitative and Quantitative Risk Analysis (QRA) to thoroughly and impartially evaluate the risk and impact that this facility would have on the region. Local governments and residents should choose the people who make this risk analysis. It should be paid for by Inergy. If the project is worth the risk, the company should have nothing to fear from a QRA.

Thank you for considering my concerns and suggestions,

Nancy Kasper
From: Carrie Cohen <fabricjazz@gmail.com>
To: <dlbimber@gw.dec.state.ny.us>
Date: 10/4/2011 11:31 AM
Subject: comments Reading gas storage facility

Bald Hill School Rd.
Brooktondale, NY 14817

October 3, 2011

David L. Bimber
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414-9516

Re: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Dear Mr. Bimber,

The DEC Environmental Impact Statement for storage of LPG in salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing vital tourist industry that provides hundreds of jobs and brings many visitors to one of the most beautiful lake areas in the world.

This unattractive and noisy industrial facility will be visible and audible from the beautiful dock and waterfront area in Watkins Glen, developments that have brought economic prosperity to Schuyler County and local towns. It will be visible from Routes 414 and 79, as well as from the water, since the brine pond cannot be landscaped on the eastern side. What happens to our area if the tourist industry jobs dry up? Can hundreds of jobs be replaced by a few industrial jobs that may not go to local people?

Inergy claims that much of the truck traffic will occur in the winter months when “there is no tourism in the area.” Has the DEC studied the recent growth of tourism in the area over the wintertime? Does Inergy realize that propane delivery begins in August and