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.

2

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.

4

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,

Carrie Cohen
From: Terezka Korinek <markova66@hotmail.com>
To: <dlbimber@gw.dec.state.ny.us>
Date: 10/4/2011 10:03 AM
Subject: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

From: Terezka Korinek
378 Thomas Rd.
Ithaca, NY 14850

Oct. 5, 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,

Terezka Korinek
From: Peter Hoover <prh4@cornell.edu>
To: <dlbimber@gw.dec.state.ny.us>
Date: 10/4/2011 9:46 AM
Subject: LPG gas storage under Seneca Lake

Peter Hoover
October 4, 2011

5785 Rumsey Road (Town of Hector)
Trumansburg, NY 14886

David L. Bimber
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, NY 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 solutional salt mines in Reading, NY leaves many questions about the environmental, economic, and cultural impact of this project on Seneca Lake and Schuyler County unaddressed. It is hard to see adequate benefits to the local area that can offset the massive costs to our local population and our growing and vital tourist industry, which 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 its 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? Does Inergy realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at a 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 minimal numbers of 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 lack sufficient 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.

Economic and safety issues:

Who is responsible for maintaining the roads that will experience 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 municipality 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 to 32 rail cars per day carrying thousands of gallons of flammable LPG traveling over miles of track near residences and 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 such materials. 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 faults 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 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 of 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 reverberate across and around the entire lake valley?

Since there is some evidence (Halfman, Finger Lakes Institute; Wing, et al) of a higher salt content in Seneca Lake from migration up from salt caverns, can't we assume that LPG and butane will also 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 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. 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 and recent behavior 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 used
eminent domain law to take individual properties 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,

Peter Hoover, 5785 Rumsey Road, Trumansburg, NY 14886, 607.387.5171, prh4@cornell.edu
From: Kbnsn12 <kbnsn12@aol.com>
To: <dlbimber@gw.dec.state.ny.us>
Date: 10/4/2011 2:45 PM
Subject: Salt Cavern in Reading

3702 Saddleback Rd Canandaigua, NY
09/04/11

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. 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,

Kimberly Anne Benson
From: "Frank n Donna Davis" <drfdavis@htva.net>
To: <dlbimber@gw.dec.state.ny.us>
Date: 10/5/2011 10:48 AM
Subject: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Donna R. Davis
3221 St Rt 414, Burdett, NY 14818

5 October 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,

Donna R. Davis
Sunset on Seneca B&B
607.535.6973
sunsetonseneca@watkinsglen.com

Your name

Donna R. Davis
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.
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.

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.”

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 our concerns and suggestions,
Engineer on gas project: ‘Seems kind of risky’

FROM PAGE 1
was probably high, but that the
damage would vary depending
on the severity of the collision.
His research has revealed that
the proposed facility will be
the largest LPG storage facili-
ty in the northeast and Inergy
has relatively little experience
in the LPG storage industry. He
added that it is the norm in the
industry to retain a third party
to prepare a quantitative
risk assessment, especially for
a project of this scale. Sorenson
was not sure why this has not
been done yet, but said that un-
til it is, the project “seems kind
of risky.”

The discussion then turned
to Sorenson’s concerns with
the proposed facility which he
felt were not fully addressed
by the DEIS. One of Sorensen’s
concerns was the burden an ex-
plosion or other disaster wou-
dl be placed on the local Fire De-
artment. Most of the firefigh-
ters who would respond to an LPG
disaster would be volunteer.
Sorenson argued that because of
the unique scenarios created by
LPG disasters, additional train-
ing and equipment would be
required. Although he felt the
DEIS appropriately addressed
on site disaster concerns, off
site scenarios, like transportation
risks and the risk to adja-
cent facilities, was lacking.

Another of the holes in the
DEIS identified by Sorenson
was the lack of a comprehen-
sive analysis of an accidental
release of LPG. He said that
when LPG is released into the
atmosphere it quickly evapo-
rates and forms a dense cloud
of gas. LPG storage facilities are
typically located where the ter-
rain is level; this facility, how-
ever, would be located on a hill-
side. It is Sorenson’s belief that
if an accidental release were to
occur, the cloud could drift
down the hill to Seneca Lake
with the potential to travel to
Watkins Glen depending on the
prevailing wind direction. So-
renson emphasized that this
was a hypothetical, and that no
one really knows what would
happen to this gas cloud be-
cause the proper analysis has
not been done. Until then, So-
renson said, “we are all arguin-
g about speculation.”

Sorenson concluded the pres-
tation by explaining that al-
though the DEC will require best
industry practice safeguards
before allowing the project to move
forward, this does not eliminate
the possibility of a disaster. The
DEC leaves it up to local govern-
ments to decide the acceptable
level of risk for their respective
communities, he said. Sorenson
concluded that was why a risk
assessment becomes important
as a means to analyze the pos-
sibility of a disaster scenario,
the potential harm, and to deter-
mine what can be done to miti-
gate those risks.

Although several local offi-
cials were in attendance, includ-
ing Watkins Glen Mayor Mark
Swinnerton and Schuyler Coun-
ty Legislative Chairman Dennis
Fagan, there was no official
response from any locality.
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,

Jesse Beardslee
Dear Mr. Bimber,

It is with heavy heart that I see that the Department of Environmental Conservation is not living up to its title. Many things are at risk with the LPG and fracking issue but make no mistake it is not born out of fear. Sure this is an emotional issue for many people but please understand, it ought to be when you consider that it may not only effect the present generation but future generations. My concerns, and that of many of my neighbors, are borne out of vigilance.

As you may or may not know, fresh water is a serious global issue. According to the United States Geological Service we are in crisis concerning fresh water not only globally but in the United States. We tend not to pay much attention to this problem, in part, because it is not covered in the media but more than that we are blessed to live in a fresh water rich area. In many ways we are buffered from the many consequences that many states must deal with in order to provide clean potable water for its citizens but also for agriculture.

The Department of Environmental Conservation 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 Department of Environmental Conservation 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?
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 Department of Environmental Conservation, 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
Compatible businesses and industry have postponed plans to develop or are selling before their
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 Department of Environmental Conservation 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 Department of Environmental Conservation 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 Department of Environmental Conservation 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 Department of Environmental Conservation 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.

I would like to think that the Department of Environmental Conservation is not beholding to corporate interests and pressures but rather is first and foremost concerned with the well being of the environment and all creatures the rely on it for sustenance.

Thank you for considering my concerns and suggestions,

Sincerely,

Harold Brown
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 Myers

[Signature]
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,

Rudolf Schlief
5873 Rte 414
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,

Ann C. Martine
Director
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 8 to 10 industrial jobs that may not go to local people?

I grew up in a very industrial area of Michigan, Flint. I did not like living there. I have nothing very nice to say about Flint. I could not wait to be eighteen so I could leave. When I found this beautiful area in the Finger Lakes, I thought I was living in Paradise. People come from all over the land to visit this spectacular area. If you and the DEC make it into an industrial hub, where will they go to see beauty? People do not want to go on vacation and fight traffic and smell exhaust fumes and see gas burning on the hillside!

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. I took a walk one day down to the lake and heard the sound of the loons. It was mystical and beautiful. 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. We have a Saturday morning bird walk to observe the wildlife in the area. One Saturday you could come and take a walk with us. It is so wonderful and magical! 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.

I question 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 all on the same side: THE HUMAN SIDE. What are we thinking? Do we really want to do something that will eventually poison our clean water? The earth is our mother and it is the only place we have right now to live. I do not want to be destroyed like the dinosaurs. Have you watched the movie “The Book of Elijah”. It is a science fiction view of where our world is going. It’s pretty scary and ugly.

Respectfully,

Melissa Chipman

5399 State Route 414
Hector, New York, 14841
USA
(607) 546-7719
David Bimber - Protect Existing Businesses and Finger Lakes Environment by saying No to Inergy.

From: "L Hogan" <lh57@BasicISP.net>
To: <dlbimber@gw.dec.state.ny.us>
Date: 10/6/2011 3:19 PM
Subject: Protect Existing Businesses and Finger Lakes Environment by saying No to Inergy.

Laura Hogan
186 Besemer Hill Rd.
Ithaca, NY 14850
October 6, 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? WE ARE TALKING ABOUT 8 JOBS VS. 100s of tourism jobs!?! That's a no-brainer.

Listing b&bs, motels, restaurants and wineries as area attractions is a HUGE UNDERSTATEMENT. They are the local business, much preferable to INDUSTRIAL business here in this scenic area. Gas storage is not an appropriate use of this area.

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? I VISIT WINERIES IN THE WINTER, AND MORE AND MORE OTHER LOCALS DO TOO!

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. IE, COULD THERE BE EXPLOSIONS?! SINCE WHEN DO WE TRUST GAS OR OIL INDUSTRIES TO SELF-REGULATE AND PROTECT THE ENVIRONMENT. I'M SORRY BUT THE RECORD IS CLEAR. THEY WOULD RATHER DO THEIR DAMAGE AND PAY FINES THAN NOT DO THEIR DAMAGE!

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,

Laura Hogan
From: Shalestone <shalestone@empacc.net>
To: <dlbimber@gw.dec.state.ny.us>
Date: 10/6/2011 6:02 PM
Subject: LPG storage

9515 Caywood Rd.
Lodi, NY 14860

October 6, 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 difficult to see how the supposed benefits from the proposed LPG facility will offset the potentially 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.

As a local owner of a winery and vineyard, I am especially concerned with 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? Additionally, this coincides with grape harvest, when grape growers must pick and transport their fruit in a clean, safe, and timely manner. Increased truck traffic during this already busy time is dangerous and unwelcome.

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

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?

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,

Rob Thomas
Winemaker/Owner
Shalestone Vineyards
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,

I am writing today because I am concerned with the DEC Environmental Impact Statement for storage of LPG in the Salt Mines in Reading NY. I feel this document leaves many questions about the environmental, economic and cultural impact on this project on Seneca Lake in Schuyler County. It is difficult for me to see the benefits of this project to our growing vital agricultural and tourism industry.

I am truly concerned about the increase of traffic on our already crowded roads. 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?

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?
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?

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.

I question why Inergy is so determined to build this facility in a world class tourist destination this just does not make sense. Should they not consider a less populated site perhaps? A sight that is not surrounded by clean drinking water?

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. This is completely unacceptable.

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.”

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.

You have witnessed the beauty of the Finger Lakes. I urge you to help protect this most unique and beautiful Lake Seneca.

Thank you for taking the time to address my concerns

Peace,

Ellen Stechman
P.O. Box 113
Hector, NY 14841

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 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,

Julius D. Kohena
5147 Club Seneca Road
Hector, NY 14841
David L. Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
6274 East Avon-Lima Road  
Avon, New York 14414-9516

October 3, 2011

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,

Loueva M. Kohena
5147 Club Seneca Road
Hector, NY 14841
David L. Bimber  
Deputy Regional Permit Administrator  
New York State Department of Environmental Conservation  
6274 East Avon-Lima Road  
Avon, New York 14414-9516  

Post Office Box 3826  
Ithaca, NY 14852  
November 4, 2011

New York State Department of Environmental Conservation  
6274 East Avon-Lima Road  
Avon, New York 14414-9516

OCT 6 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. 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,

Dr. James R. Haustein
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?
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 Babcock
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?
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 Cody
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 Babcock
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 near 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?
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,

Rena Caldwell
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?
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,

Shannon Caldwell
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
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.

Michele Griego
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. This study should be done by a non-partisan un-biased 3rd party.

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? Our drinking water is our most valuable resource, without fresh water available life will parish. Plant life, animal life, and Human life.

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,

Lisa Woodhams
P.O. Box 113  
Hector, NY 14841  
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 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]

John C. Kohena
5147 Club Seneca Road
Hector, NY 14841
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,

Shirley J. Kohena
5147 Club Seneca Road
Hector, NY 14841
From: <bodacamp@aol.com>
To: <dlbimber@gw.dec.state.ny.us>
Date: 10/6/2011 8:57 AM
Subject: Proposed Seneca Lake Gas Storage Facility

2821 state route 12 b
Deansboro, NY 13328

October 6, 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 Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for Watkins Glen Gorge? The Route 329 Bridge that the trains plan to use is in poor condition and is unsafe for 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? 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,

Tom Campbell
From: <Oppermax@aol.com>
To: <dlbimber@gw.dec.state.ny.us>
Date: 10/6/2011 9:07 AM
Subject: Comments on Gas Storage

Amy Opperman Cash
4936 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,

We are owners of Larson Publications on Route 414 in Hector, NY overlooking Seneca Lake. We live across the street right next to J.R. Dill Winery and have been delighted by the growth of the wine and tourist industry in the past ten years.

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

Amy Opperman Cash

Larson Publications
From: Macinski Martha <mmacinski@mac.com>
To: <dlbimber@gw.dec.state.ny.us>
Date: 10/6/2011 1:50 PM
Subject: Standing Stone Vineyards letter re Inergy facility in Reading NY
Attachments: 2011_10_06_13_46_22.pdf

Martha Macinski
Standing Stone Vineyards
9934 Route 414, Hector, NY 14841
(East shore, Seneca Lake)
www.standingstonewines.com
607-582-6051 - office
607-279-4731 - mobile
October 5, 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.

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 DEC realize that propane delivery begins in August and continues through autumn months in this region, when tourism is at its peak? During the months of September through November, we saw just under 10,000 people at our winery alone last year. The numbers have been steadily increasing since we opened in 1994. As to the winter traffic, we find it economically viable to keep our winery tasting room open year ‘round for weekends, and by April we re-open every day of the week, which continues through November.

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.
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.

**Economic and safety issues:**
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? Has DEC assessed this scenario?

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? 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. Inergy should not construct this facility in a world-class tourist destination, but should place it somewhere more remote; farther away from residences, and on a flatter terrain.

**Ecological and other issues:**
Has DEC considered 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?

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. Has DEC addressed 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? Has this been adequately addressed – we think not.

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 believe 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.

**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. 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. Has DEC considered the long term, cumulative effects of Inergy's planned expansion? There is a disparity between what they say 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, it appears that intend 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. 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 our concerns and suggestions,

Tom and Marti Macinski, Standing Stone Vineyards
October 5, 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,

Sarah Hilsman
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 Energy 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,

Vicky Southall
Mr. Bimber,

Please excuse me I misspoke, my comments are on the storage project and the effects it will have on upstate New York (including the BEAUTIFUL BUTTERNUT VALLEY).

Thankyou...Constandina M. Roux

From: David Bimber <dlbimber@gw.dec.state.ny.us>
To: Constandina Roux <croux12@yahoo.com>
Sent: Friday, October 7, 2011 1:56 PM
Subject: Re: Opinion on fracking in the Beautiful Butternut Valley

Ms Roux:

Thanks you for you letter. It was not about fracking, but about the Finger Lakes LPG storage project that I am working on. The LPG project does not propose fracking activity.

Dave

David L. Bimer
Deputy Regional Permit Administrator
NYS DEC, Division of Environmental Permits
6274 East Avon-Lima Road
Avon, New York 14414-9519

Email: dlbimber@gw.dec.state.ny.us
Voice: 585-226-5401
Fax: 585-226-2830

>>> Constandina Roux <croux12@yahoo.com> 10/7/2011 1:22 PM >>>
Dear Mr. Bimber...

Please acknowledge attachment regarding "Fracking in our Beautiful Butternut Valley."

Thankyou...Constandina M. Roux
October 3, 2011

Constandina M. Roux
161 Oppermann Rd.
South New Berlin, New York 13843

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,

Constandina M. Roux
From: Glen Silver <gsilver@localnet.com>
To: David Bimber <dlbimber@gw.dec.state.ny.us>
CC: Glen Silver <gsilver@localnet.com>
Date: 10/8/2011 5:07 PM
Subject: Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility in Reading, NY (DEC Facility ID 8-4432-00085)

Concerned Citizens of Seneca County, Inc. (CCSC)
P.O. Box 77, Romulus, NY 12210
315-412-0407
e-mail: ccsenecacounty@gmail.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. 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,

Respectfully submitted,

Glen Silver, President, CCSC
From: Chris chapman <chrischapmanis@yahoo.com>
To: "dlbimber@gw.dec.state.ny.us" <dlbimber@gw.dec.state.ny.us>
Date: 10/10/2011 8:58 PM
Subject: Schuyler County Resident's comments on Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility

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,

Chris Chapman, Schuyler County resident
From: chris chapman <chrisamiss@yahoo.com>
To: "dlbimber@gw.dec.state.ny.us" <dlbimber@gw.dec.state.ny.us>
Date: 10/10/2011 9:27 PM
Subject: LPG storage, Watkins Glen

Mr. Bimber,

attached is a letter which reflects many of my personal concerns regarding the industrialization of the area in which I live. It is a form letter but I am not a “form” and neither are my family or neighbors. We are the individuals whose environment you are charged with preserving. I moved here and live here because of the uniquely pristine and beautiful environment. If the proposed LPG storage facility and hydraulic fracturing natural gas extraction become a reality here I will be a part of the exodus from the area, probably the state. I will be leaving because these industries are not compatible with a pristine environment, they are a rape of it.

I appreciate the difficulty of your position and the many pressures placed upon you. I recognize that many consider the proposed industrial projects mentioned above a local sacrifice for the “greater good”. They are wrong, the protection of our environment, the fresh water and beautiful landscape that it encompasses are the greater good, they are irreplaceable and unrecoverable.

Thank you for your consideration,

Peter Andres
Concerned Citizen
4881 Voorheis Road
Trumansburg, NY 14886

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 huge 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
From: "Jena Andres" <jandres@smith.edu>
To: <dlbimber@gw.dec.state.ny.us>
Date: 10/10/2011 8:55 PM
Subject: Schuyler County Resident comments on Proposed Finger Lakes Liquefied Petroleum Gas Underground Storage Facility

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 with the negative impact that the Inergy facility will have on Schuyler County and Seneca Lake.
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?

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