



Joint Landowners Coalition of New York, Inc.

To foster, promote, advance and protect the common interest of the people as it pertains to natural gas development through education and best environmental practices.

PO Box 2839

Binghamton, NY 13902

Dear Commissioner Martens:

The Joint Landowners Coalition of New York, Inc. (JLCNY), consisting of 38 landowner coalitions, representing more than 70,000 people and over 800,000 acres, submits a list of our concerns regarding the dSGEIS. We will, by December 12, 2011, provide our detailed comments on these and other concerns.

- The Stormwater Pollution Prevention Plan (SWPPP) should provide framework for ensuring polluting substances do not leave the site. The Best Management Practices (BMP) should be more of a checklist allowing the developer to choose the most appropriate BMP for each situation, subject to DEC approval.
- Why 2 SWPPPs?
- There is a need for better maps of the “Focus Areas” for grasslands and forest protection. Also, the text is unclear.
- Local impacts on roads will be addressed with “Road Use Agreements” and the “Ad Valorem Tax”.
- Setbacks need to be consistent throughout the dSGEIS.
- The 4000 ft. setback from the NYC watershed will extend into a different river watershed with no chance of runoff reaching the NYC watershed.
- Other setbacks need to be reviewed with the SWPPP and the history of drilling through aquifers considered.
- The overall tone of the Executive Summary is negative. An Environmental Impact Statement should address positive impacts as well as negative ones.
- Economic impact in terms of job growth will be positive. We are already seeing it with NY workers going to work in PA.
- If invasive species are found and removed or killed why require inspection and cleaning of all vehicles from site(s).
- Need not duplicate water withdrawal permits in areas where Susquehanna River Basin Commission or Delaware River Basin Commission have authority.

SIGNATURE: _____

NAME (PRINTED): _____

ADDRESS: _____

COALITION MEMBER: YES NO _____
(Coalition name)