

WHEREAS, many entities, including Tompkins County, are now striving for at least an 80% reduction in greenhouse gas emissions by 2050, and it is understood that natural gas could serve as a lower-emissions fuel source as the nation transitions to renewable sources of energy (provided that in the course of its development it is not a net eCO₂ emitter), and

The Document, in several places, most notably page 7-64, identifies additional mitigation measures for well-drilling operations in the New York City Watershed. Such standards must apply equally to all watersheds with municipal water supplies. In Tompkins County this would include the entirety of the Cayuga Lake watershed.

Tompkins County has established a policy to “Reduce community greenhouse gas emissions by at least 2 percent of 2008 base year emissions per year to reach, at a minimum, an 80% reduction from 2008 levels by 2050.” [Tompkins County Comprehensive Plan: Energy and Greenhouse Gas Emissions Element, 2008] In response to a request from the NYSDEC Tompkins County reiterated this commitment by signing on to the DEC’s Climate Smart Communities Pledge in April 2009. According to the Document, over the 30-year well lifetime, emissions from 100 one-well projects will more than double all community emissions in Tompkins County over that same 30-year time period. The result is that the proposed gas drilling, if implemented, will make it impossible for Tompkins County to meet its greenhouse gas emissions goals. The cumulative impact of drilling in the Marcellus Shale may make it impossible for New York State to meet its greenhouse gas emissions goals. This cumulative impact should be clearly evaluated in the Document. The Document should require operators to detail how their drilling operation will meet specific emissions thresholds, and what mitigation measures will be implemented to accomplish those emissions levels.

It is essential that all of the requirements to mitigate impacts of this activity, as described herein and in other comments, be incorporated in formal regulations issued by the NYSDEC after an additional formal comment period. This is the only way to assure compliance with, and consistency in the administration of, those requirements. The Document does not propose, and it is our understanding that NYSDEC does not intend to issue, specific regulations regarding drilling in the Marcellus Shale. NYSDEC must undertake a formal rulemaking, rather than just trying to add to the existing forms, application documents, and conditions that NYSDEC has been using for decades and to use state-of-the-art scientific standards as a basis for such rulemaking. The NYSDEC must take the time to conduct the necessary research (and to make use of results from the upcoming Environmental Protection Agency’s review) prior to proposing regulations.

, and the New York Conference of Mayors.

SEQR ACTION: Not a SEQR Action
