

Catskill Mountainkeeper
Sierra Club Atlantic Chapter
Riverkeeper, Inc.
Delaware Riverkeeper Network
Natural Resources Defense Council, Inc.
Catskill Center for Conservation and Development
The Wilderness Society
Catskill Citizens for Safe Energy

July 25, 2008

Governor David A. Paterson

State Capitol

Albany, NY 12224

Dear Governor Paterson:

On behalf of the undersigned organizations, we are writing to urge you to institute a moratorium on all new gas drilling permits at least until the completion and public review of the comprehensive environmental impact statement announced by the Department of Environmental Conservation (DEC) today to address the potential impacts of all natural gas drilling that might be permitted in the state.

Your July 23, 2008 press release stated that you directed DEC to prepare an "updated" Generic Environmental Impact Statement (GEIS) under the State Environmental Quality Review Act (SEQRA) to ensure that all environmental impacts from drilling are addressed. The press release further stated that the update would examine potential impacts from new horizontal drilling techniques, including potential impacts to groundwater, surface water, wetlands, air quality, aesthetics, noise, traffic and community character, as well as cumulative impacts. The update will occur as part of a public review process that ensures that the State will hear and consider concerns raised by residents who could be affected by drilling activities.

The press release further announced that the State is reviewing a variety of other issues, including existing regulations, jurisdiction over water withdrawals, permit application fees and procedures, and legal and regulatory compliance that could be affected by increased drilling activity.

We applaud these initiatives, and urge you to ensure that State agencies have the resources they need to conduct the necessary comprehensive analyses so that the environment and citizens of the state are fully protected from any adverse effects of natural gas drilling.

We are concerned, however, by today's DEC press release indicating that review of pending drilling applications may proceed during the preparation of the new GEIS. We believe that a complete freeze on new drilling permits is necessary, and that even requiring that pending applications be subject to an individual environmental review process is insufficient. Among other serious concerns, we believe there is the potential for inconsistencies between EIS's prepared by individual companies and the statewide GEIS, particularly in the critical area of cumulative impacts.

Oil and gas activities in the state are currently operating under rules and assumptions that are outdated. Since the last EIS was completed, there are new technologies being used and new environmental protections available to industry. There is also a great deal more information available regarding the potential impacts of drilling to our clean air and water.

We must have an evaluation of all the potential impacts to New York State farmland, the New York City Watershed, Catskill Park, the Upper Delaware Scenic and Recreational River and other ecologically sensitive areas before these new technologies are employed. And these impacts must be fully analyzed in the updated GEIS before DEC issues any new permits.

We therefore urge you to change course and institute a moratorium on all new gas drilling permits until the necessary precautions are taken.

Natural gas development is progressing across the country at a scale and pace that no one ever envisioned. Let New York State be a model of how to do this right.

Thank you for your support on this issue.

Sincerely yours,

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Cc: DEC Commissioner Pete Grannis
Deputy Secretary for the Environment, Judith Enck
DEP Commissioner Emily Lloyd