

Sent: Thursday, August 20, 2020 12:05 PM

Subject: Borger Expansion

Borger Expansion Berkshire Hathaway's Borger Natural Gas Compressor Station in Ellis Hollow is asking the Town Board of Dryden for a permit that would allow it to increase its Greenhouse Gas Emissions (CO₂e) by as much as 32% (20,000 tons/year). On the face of it, the proposed increase is huge and will affect the environment for as long as Borger operates—in other words, for decades into the future. Although required by State Law, Borger so far has not made public how much global warming/climate changing methane it is/will emit or what measures it will take to reduce them. Before it gives Borger a permit, the Dryden Town Board has a duty of due diligence under the State "SEQR" Law to study the potential global warming/climate changing impacts of Borger's projected Greenhouse Gas Emissions. The purpose of the study is decide how potentially large and how long the emissions will affect the environment. Given the technical nature of a compressor plant's operations and the interaction of Greenhouse Gas Emissions with the environment, the study the Board must do is complicated and requires special expertise. In short, our layperson Town Board should have expert help to gather the necessary information and compare it to the requirements of the State's SEQR Law. The Board often hires experts for just such purposes, so doing so in this case would be business as usual. Our Laws also let the Board charge these expenses to Borger. If after doing this due diligence study, the Board decided that the Emissions could cause a significant, negative impact on the environment, an Environmental Impact Statement (EIS) is prepared that lays out what steps Borger would have to take reduce its Greenhouse Gas Emissions. Once the reduction measures are agreed upon and put into the EIS, the Board could issue a permit to Borger. Conclusion and Request: Because Borger has asked for a permit to increase its Greenhouse Gas Emissions by as much as over 20,000 tons/year and 32%, because this increase will be allowed as long as Borger operates, we respectfully request that the Town Board do its due diligence under the SEQR Law with expert assistance to assure that its decision is based on a complete set of the relevant facts and the applicable science.

Ale Nixon
1 Sunny Knoll Rd.

Sent: Wednesday, August 12, 2020 8:59 PM

Subject: Town of Dryden "

From: Allison Wilson

Message Body:

Dear Dryden Town board (Jason Leifer, Supervisor; Dan Lamb, Deputy Supervisor; Kathy Servos, Jim Skaley, Loren Sparling),

I live very near Dryden on the east side of Ithaca. I am very concerned about a request that Dominion/Berkshire Hathaway's Borger Station has made to the Dryden town board for permission to increase GHG emissions and expand its operations. As a scientist and informed citizen, I would suggest that now is not the time for localities to be adding to their Green House Gas (GHG) emissions. Nearly every day new scientific data comes out describing the outcomes of our current climate catastrophe. (Eg. <https://www.sciencemag.org/news/2020/07/after-40-years-researchers-finally-see-earths-climate-destiny-more-clearly>). Now is the time to be doing all we can to cut emissions and reduce energy use in our communities — which will concurrently reduce air pollution and likely greatly improve our health.

We already know that residents near Borger Station suffer negative health impacts from the station which can only increase with expansion: https://www.ithaca.com/news/experts-borger-station-expansion-could-have-health-risks/article_e4439196-ca56-11e7-94ed-eb3b3cbab4c9.html. Current pollutants found in residents air were " 31 chemicals in the cocktail discovered around Ellis Hollow" that are "associated with circulatory diseases like heart attacks and strokes. An additional 59 of those chemicals are carcinogens, including 23 classified as 'known human carcinogens'." More GHG emissions mean more toxins in our air as well.

For this reason I urge you to follow Town and State law and carry out a careful and expert assessment of the health and wider environmental impacts, as well as GHG impacts of allowing Dominion/Berkshire Hathaway's Borger Station to increase its Greenhouse Gas Emissions and expand its operations.

At this crucial juncture in our understanding of the hazards of high levels of air pollutants and increased GHG emissions, and given the magnitude and impact of these proposed increased emissions by the station, it is essential that a careful, expert and transparent environmental impact assessment be carried out, preferably with input from the Dryden community and the wider NYS community. No permits should even be considered until such an assessment has been carried out, otherwise the board will be making a decision based on no independent information on the actual impacts for Dryden and the wider community of the proposed expansion.

Granting permission for increased emissions is not something to rush into as the impacts will impact Dryden, the wider community and the planet for decades if not centuries.

Yours sincerely,
Allison K Wilson, PhD

Sent: Wednesday, August 19, 2020 6:39 PM

Subject: Borger Compressor Station

Dear Dryden Town Board Members,

I am writing to you as a concerned neighbor regarding the Borger Compressor Station, and their request for a special permit that would allow them to legally increase their greenhouse gas emissions. I do not live in Ellis Hollow, but I do live in Danby, which is just a couple of small towns over. I feel the increase in carbon and methane emissions Dominion is seeking permission for would have an irresponsibly large and negative impact on global warming and climate change, and is therefore a matter that affects all of Tompkins County, our region, and indeed the whole planet. I urge you, as Dryden Town Board members, to advocate for the hiring of an outside expert who could study the impact of the proposed increase in emissions, and to postpone the public hearing on this issue until that study has been completed, and the findings compared to New York State's SEQR laws, as well as our county's goals for reducing greenhouse gas emissions.

I urge you to use your influence as decision makers to make our region and our planet safer for the children that live here. I have a 6-year-old son and a 2-month-old daughter, and they, along with all the other young folks, will be inheriting the outcomes of our choices as adults.

Thank you so much for your time in reading this, and for your work as local decision makers!

Sincerely,

Nora Brown

Danby, NY

Sent: Wednesday, August 19, 2020 4:07 PM

Subject: No to Borger Station's increase in yearly greenhouse gas emissions!

Hello,

Please do everything you can to deny the Borger Station the permit to increase their emissions. Their request would increase emissions by as much as 30+% and would negatively impact the environment, not only in the immediate vicinity but throughout Dryden and beyond. People choose to live in this very special area for the positive effects of clean nature on our health and wellbeing. Allowing the permit would put the community in jeopardy.

Please follow the town and state law and take the necessary time to study the potential impact of their proposal. And then deny the permit.

Thank you.

Cathy J. Saloff-Coste

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Cathy J. Saloff-Coste, MS, RDN, CDN, CEDRD
Nutrition ReSource
120 E. Buffalo St., Suite 3-2
Ithaca, New York 14850
Certified Eating Disorders Registered Dietitian

Sent: Wednesday, August 19, 2020 3:29 PM

Subject: Borger Station

Dryden Town Board -

Less than 3 years ago I retired to the beautiful environs of Ellis Hollow and have never been anything but overjoyed about that decision. Each day brings gratitude for the feeling of being in a special corner of our planet that provides an element of removal from the craziness that has become the world around us - a sanctuary among nature and as a part of a rural community of like minded neighbors. Often times I walk the nearby roads and the trails of the Ellis Hollow Nature Center, experiencing the beauties, sounds, and fresh air of all that is our surroundings.

I am disturbed to now learn of the proposal before you regarding the Borger Station expansion. As the crow flies (and as emissions travel) I live less than a mile from this Station. I currently live with a seriously compromising health condition so I would hope that you would appreciate my concern.

A career in public service makes me quite aware of the fact that “ progress” comes with costs. This leads me to wonder what benefit would be realized by the Town of Dryden and the community of Ellis Hollow by approving this proposal. No doubt you are fully schooled in the impact of methane on our climate and our health. The respective goal should be a reduction of methane emissions. By all appearances, this proposal appears to move us backwards.

I am writing to encourage your votes of disapproval with gratitude for your consideration.

Richard Bennett
1544 Ellis Hollow Road

Sent: Wednesday, August 19, 2020 2:32 PM

Subject: Dominion Energy special use permit for Borger Compressor Station

August 19, 2020

TO: Dryden Town Board

FR: Zorika Henderson, Dryden resident

RE: Dominion Energy special use permit for Borger Compressor Station

The request by Dominion Energy for a special use permit to expand operations at its Borger Compressor Station in Ellis Hollow should undergo a review through an Environmental Impact Statement.

Based on Dominion's data and the EPA's Greenhouse Gas Equivalency Calculator, there will be an increase of approximately 30 percent in CO2 emissions (more than 25,000 additional tons per year).

There will also be comparable increases in other air pollutants. A study [1] found that, excluding CO2 and methane, the 18 compressor stations in New York State for which EPA data were available emitted an average of more than 1,000 tons of these other pollutants in a seven-year period. The pollutants included "39 chemicals known to be human carcinogens."

Please read my comments into the record at the public hearing.

[1]. Pasquale N. Russo and David O. Carpenter. Air Emissions from Natural Gas Facilities in New York State. *International Journal of Environmental Research and Public Health*, May 2019, 16(9):1591
<file:///C:/Users/Owner/AppData/Local/Temp/ijerph-16-01591.pdf>

Sent: Wednesday, August 19, 2020 2:11 PM
To: Bambi Avery <townclerk@dryden.ny.us>
Subject: Special Use Permit comment

Good afternoon,

I've recently moved to the area and am learning that the Borger Station is requesting a permit to increase emissions without the required Environmental Impact studies. Understanding the full scope of the impacts of issuing this permit should be known before it is issued. Please require that they conduct the necessary studies to prove that their emissions will not degrade our environment and therefore our lives. It is their legal duty to do this and as the town board it is your both legal and political duty to ensure that the impacts are studied, known, and provided to the public.

Thank you for your time,
Susan Licher
350 Hurd Rd.
Ithaca, NY 14850

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Susan Licher

Sent: Wednesday, August 19, 2020 2:10 PM

Subject: Concerns regarding Dominion Special Use Permit regarding emissions

8/19/2020

Dear Dryden Town Board Members Jason, Dan, Kathy, Loren and James (cc Bambi Avery, town clerk),

Thank you for sharing the information regarding Dominion's recent Special Use Permit request.

Pasted below (and attached as a pdf) is a letter that outlines our several concerns regarding Dominion Special Use Permit regarding emissions, as well as proximity to publicly used recreating land and trains and to lack of mitigation of noise, visual, and lighting impacts.

Thanks you.

Sincerely,

Charles "Chip" Aquadro and Gwen "Wendy" Aquadro
283 Ellis Hollow Creek Road, Ithaca, NY

Date: August 19, 2020

Dear Town of Dryden Town Board Members,

We are writing to express several concerns regarding the proposed modifications to Dominion's Borger Station in Ellis Hollow, Ithaca, NY through their Special Use Permit request dated June 10, 2020 to the Dryden Planning and Zoning Department.

In addition to concerns shared by others regarding the up to 30% increase in CO₂ emissions, we have some new concerns regarding a failure to address the annoying "whine" noise from the regulator field at times when the compressors are running (detailed below). We also raise concerns regarding proposed vegetation visual shield and light pollution to neighboring properties. We have lived immediately adjacent (we share the Station's eastern property line) for 31 years and have had mainly good relationships with the few people from the Station with whom we have interacted. We work to be good neighbors and wish to remain such.

The new compressors do significantly reduce emissions of certain toxins which is excellent, but the up to ~30% increase in CO₂, and 25% increase in CH₄ (<http://dryden.ny.us/wp-content/uploads/2020/08/2020.07.30-Borger-Replacement-Project-Response-to-Questions.pdf>) is a serious environmental concern that is not objectively evaluated in the current application. This concerns us like it does many of our fellow Ellis Hollow and Dryden residents.

Noise from Regulator Field: This major increase in emissions must mean that much more gas will be pumped through the pipelines, which raises a noise concern that is not even mentioned. While the compressors themselves may not be significantly noisier (due to insulation and

engineering), there is no mention of the effect on noise emitted by the regulator field to the NE of the new compressors. As it is, the regulator field often emits high pitched single tone-type “whines” or “squeals”. These sounds may only last for a short time (half an hour) but sometimes last for hours (particularly in the morning and sometimes in the afternoon). The “whine/squeal” sounds emitted are roughly single tone (~645 Hz recorded at ~60 dB (A weighting) at 8:30 am on Nov 12, 2019 at our property line shared with the Borger Station) and as such particularly penetrating and annoying and carry quite far (we can sometimes here it inside our house with all windows closed). We are the second closest residence to the station, and the closest to the regulator field (only several hundred feet to our property line, and ~600 feet between our house and the regulator field).

We find the current regulator “whine/squeal” noise unacceptable when it occurs, and are very concerned that it will increase (perhaps dramatically) without mitigations. And there is no mention that I have found of any mitigations in the regulator field noise. We have discussed this in the past with the previous long-time Station manager, Fred Solveson, and he was always responsive to tuning pressure in the line to avoid the regulator whine. Replies to more recent requests have focused remediations on the buildings, not the regulators and exposed piping based on the continued whining that occurs between mid-fall and mid-spring (most recently, we sent a written appeal specifically about the regulator noise in June 2018 to which Donald E Houser promptly replied via email 6/20/2018: *“This summer Dominion Energy is replacing the regulator building at Borger Junction, which we hope will mitigate the noise. The current structure is aging. The new building will have much more insulation and will be of a better construction.”* But the regulator whine persists sporadically (mainly early to mid-mornings) between mid-fall and mid-spring when the compressors appear to be running.

There appear to be reasonable solutions available to this industry recognized noise problem (e.g., <https://insulation.org/io/articles/the-role-of-insulation-in-noise-control/> and <https://www.acoustiblok.com/2018/04/24/gas-compression-station-noise/>)

Proximity to publicly used local scenic and aesthetic resource: The new applications Full Environmental Assessment Form (<http://dryden.ny.us/wp-content/uploads/2020/06/Attachment-9-Part-1-Full-EAF-1.pdf> signed June 10 2020) also incorrectly answers a question related to proximity to publicly used scenic and aesthetic resources. (from PDF page 13, item E3h)

“h. Is the project site within five miles of any officially designated and publicly accessible federal, state, or local scenic or aesthetic resource?” **The “NO” box is checked.**

In reality, the heavily public used Ellis Hollow Nature Preserve of the Finger Lakes Land Trust surrounds two sides of the facility (the Ellis Hollow Nature Preserve) within ~300 feet (trail maps shown here also indicate the current Borger Station buildings: <https://ithacatrails.org/map?trailList=Ellis%20Hollow%20Nature%20Preserve>).

The previous major environmental assessment (New Market Project Assessment filed with the Federal Energy Regulatory Commission dated Oct 20 2025, Dominion Transmission, Inc. Docket No. CP14-497-000; downloaded from the Dominion website 4/29/2017) referred to in the Federal Register: <https://www.federalregister.gov/documents/2015/10/27/2015-27179/dominion-transmission-inc-notice-of-availability-of-the-environmental-assessment-for-the-proposed>)

was also flawed in seriously misrepresenting (and underestimating) the proximity of the Borger Station compressors to public recreation areas and nature trails.

Rather than being greater than 1 mile away, they are only 300 feet (or 0.06 miles) away (boundaries of Ellis Hollow Nature Preserve as well as trails are shown here: <https://www.gofingerlakes.org/wp-content/uploads/Preserve-Brochure-Ellis.pdf>).

The Yellow trail runs roughly 300' to west of main compressor building. Additional trails within 500' (trails do head mainly away from gas pumping station though one runs west-east at ~800' to north. (1 mile is 5280 ft, so closest trail is not >1mile, but rather only approximately 0.06 miles away). This misrepresentation of the distance to public trails and a nature preserve may have contributed to the past approval of their expansion and needs to be redressed by a new accurate environmental impact review.

For example, Pp 45-46, part B.6.2 of the 2015 New Market Environmental Assessment [bold added]

“A forested area on the north side of the Borger Compressor Station property is designated as conservation land by the Finger Lakes Land Trust. Although this conservation land overlaps the Borger Compressor Station property, it would not be affected by Project activities.

Additionally, hiking trails associated with this conservation land are greater than 1 mile to the west and north of the station. *While temporary construction noise may affect recreational users of these trails, the existing forested area between the station and these trails would provide screening (see also the discussion on visual resource impacts in section B.6.3 below). Therefore, the Project would not result in significant impacts on this resource area.”*

p. 48, part of B.6.3 Visual Resources of the 2015 New Market Environmental Assessment [bold added]

“A forested area on the north side of Borger Compressor Station property is designated as conservation land by the Finger Lakes Land Trust. Hiking trails exist on this conservation land to the north and west of and greater than 1 mile from the station. *Visual effects would not be significant given the presence of the existing facilities and existing forest vegetation between the station and the hiking trails. As stated above, no permanent changes to the current visual landscape are anticipated as a result of modification to the existing aboveground facility beyond what is already experienced at the site.”*

Mitigating Visual and Lighting Impacts: As an immediately adjacent neighbor, we also find the proposed mitigation of visual impact and lighting impact on neighboring properties to be insufficient or inaccurate. The proposed shrubs immediately in front of the new compressor buildings along Ellis Hollow Creek Road is only a partial visual block of the major new addition to the Borger Station which will be in full view to those driving both east and west on Ellis Hollow Creek Road (<http://dryden.ny.us/wp-content/uploads/2020/06/Attachment-6-Landscaping-Plan-1.pdf>). We thus disagree that what is currently proposed is sufficient.

Additionally, the current Borger station lighting certainly does extend to adjacent property (ours to the east), and thus we disagree with the report that shows in a figure that there will be no light emissions off of the Borger property (page 1 of <http://dryden.ny.us/wp-content/uploads/2020/06/Attachment-5-Lighting-Package-1.pdf>).

In sum, we have numerous serious concerns that are not addressed by the new Special Use Permit application submitted by Dominion June 2020, and request that the Dryden Town Board deny this application until such time as the board and town can review a new environmental impact review completed by an independent investigator.

We are very much interested in contributing to the solutions, not simply raising problems, as we value the quality of the environment and life in Ellis Hollow.

Sincerely yours,

Charles "Chip" and Gwen "Wendy" Aquadro

283 Ellis Hollow Creek Road, Ithaca, NY 14850

Sent: Wednesday, August 19, 2020 1:13 PM

Subject: Comment re. Dominion application

Dear Ms. Avery,

Please pass on to all the town board members my comment on Dominion's application for a Special Use Permit for the changes in the facilities at the Borger compressor station. I am also attaching a map showing how Dominion's New Market pipeline connects with the Iroquois pipeline.

Thank you!

Yours,
Elisa Evett

I am a member of Mothers Out Front Tompkins, the chapter of a nationwide organization whose mission is to work for a swift, complete and just transition away from fossil fuels to clean and renewable energy. We are dedicated to the idea that it will take us all to do what we must do to avert climate catastrophe, and no effort is insignificant in that goal. With that in mind we address local climate change related issues that affect us and our neighbors.

Our local chapter focused on the Borger compressor station beginning in January of 2017 and we have been involved ever since. We are determined to engage in actions that would protect the residents in the Ellis Hollow community most threatened by the potential health effects of emissions from the facility. While we are still concerned about what Borger calls 'criteria emissions,' given our broader mission, we are also concerned about the larger picture, namely the climate crisis effects of methane.

Missing from the information presented in the application are the following facts that should be a great concern to anyone who understands why we need to wean ourselves off fossil fuels:

-Dominion's New Market (DNM) pipeline takes gas from the Pennsylvania border to the Albany area (passing through Ellis Hollow on the way) where it connects to the north/south running Iroquois pipeline. The Iroquois pipeline carries gas to Canada for export, and south to the newly opened Cricket Valley Energy Center, a 1,100 megawatt natural gas fired power plant in Dutchess county, north of New York city and the CPV power plant, a 630 megawatt gas fired power plant in Orange County.

-The energy produced by these two plants serves the New York City area whose energy needs are predicted to grow.

In fact, it appears that the owners of Iroquois, which Dominion owns a controlling interest in, are banking on future growth as they are proposing an expansion in order to move more gas. And where will that gas come from? One well might suppose from the DNM pipeline. This seems to cast doubt on Dominion's claim that it will be running at only 20% capacity. Surely as the move to close nuclear power

plants in the state and the blocking of other natural gas pipelines continues, who wouldn't expect Dominion to take advantage of the demand for more natural gas to fuel these facilities. If that turns out to be the case, how can the Town of Dryden trust that Dominion will not up its capacity, and thus its emissions, by far more than the 20% it claims?

So in addition to asking the town board to hire an environmental engineer to analyze carefully the contents of Dominion's application for a Special Use Permit, I would ask that the board pursue an inquiry into the final destination and the amount of the gas going through Dominion's pipeline in the future and to consider the larger issue of the effects of increased use of natural gas as a potent greenhouse gas contributor to the climate crisis.

Respectfully submitted,
Elisa Evett

Dominion Pipelines

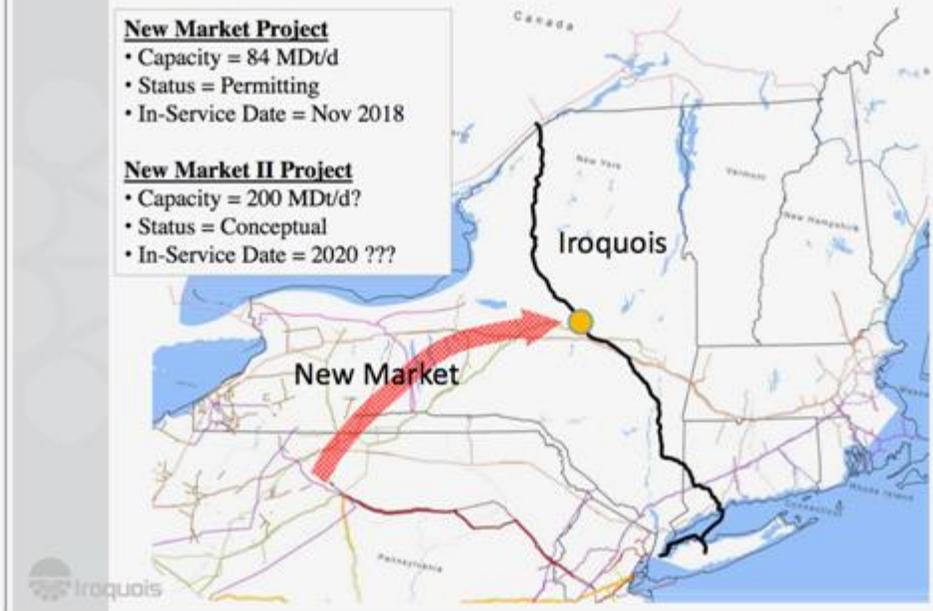
Dominion Projects

New Market Project

- Capacity = 84 MDt/d
- Status = Permitting
- In-Service Date = Nov 2018

New Market II Project

- Capacity = 200 MDt/d?
- Status = Conceptual
- In-Service Date = 2020 ???



Iroquois Gas Transmission System presentation slide from
Northeast Gas Association Forum - 4 May 2017