



Pennsylvania
Department of
Environmental Protection

Pennsylvania General Energy Company, LLC
Saluda Access Road and Staging Area
Joint Permit E4129225-017

Comment Response Document
May 6, 2026

Department of Environmental Protection

www.dep.state.pa.us

Contents

Title page	1
Contents Page	2
Introduction	3
Location Map.....	4
Comments in Support.....	5
General Opposition	5
105.18a(c)	5-6
Aesthetic Impact	6
Alternatives Analysis.....	7
Article I, Section 27	7-8
Baseline Monitoring	8
Compliance History.....	8
Degradation/EV Waters/Cumulative Impact	9
Edge Effect/Fragmentation.....	9
Invasive Species.....	9-10
Noise & Traffic.....	10
PA Wilds/Sensitive Environment	10-11
Public Hearing Request	11
Public Lands/Recreation	11
Trustee Duty of Impartiality	11-12
Wild Trout Stream	12
Appendix A – Commentor List	13-19
Appendix B – List of all comments	20-92

INTRODUCTION

Pennsylvania General Energy Company, LLC (“PGE”) is proposing a new project in Cascade and Gamble Townships, Lycoming County titled the Saluda Access Road and Staging Area (“Proposed Project”). On October 3, 2025, the Pennsylvania Department of Environmental Protection (“DEP”) received a Title 25 Pa. Code Chapter 102 Erosion and Sediment Control General Permit – 4 application (DEP File No. ESG294125011) (“ESCGP-4”). On October 6, 2025, DEP received a Title 25 Pa. Code Chapter 105 State Water Obstruction and Encroachment Application (DEP File No. E4129225-017) (“Joint Permit Application”). Collectively, the applications for the ESCGP-4 Permit and the Joint Permit are referred to as the “Applications”.

The ESCGP-4 was submitted to cover 43.8 acres of disturbance in the Wallis Run (Exceptional Value – “EV”), Bar Bottom Hollow (EV), Jacoby Hollow (EV), and Dry Run (EV) watersheds. The Joint Permit Application was submitted to construct, operate and maintain twenty (20) permanent stream crossings, nineteen (19) temporary stream crossings, eight (8) permanent wetland crossings and ten (10) temporary wetland crossings in Gamble and Cascade Townships, Lycoming County. The work involves the construction of a permanent access road and staging area.

The Proposed Project includes the construction of a 3.9-mile-long permanent access road and staging area. The proposed road will facilitate access to an existing well pad and future well pads proposed on the state forest tract. The proposed staging area will be used to store equipment and materials for the construction of future well pads and will later be used as a well pad. The proposed limit of disturbance is approximately 40 acres. All stream and wetland crossings will be open cut. The ESCGP-4 was submitted for permit coverage of the earth disturbance activities associated with the Proposed Project construction.

The Applications include Act 14 notifications that were sent to Lycoming County, Cascade Township, and Gamble Township on September 22, 2025. Coordination with the Pennsylvania Fish and Boat Commission (“PAFBC”), United States Fish and Wildlife Service (“USFWS”), Pennsylvania Game Commission (“PGC”), and the Pennsylvania Department of Conservation and Natural Resources (“DCNR”) was also considered as part of the application. Each agency was afforded an opportunity to provide input and a decision with regard to whether PGE qualified for the issuance of a permit(s).

On November 1, 2025, DEP published notice in *The Pennsylvania Bulletin* (52 Pa.B. 3443) regarding the receipt of the Joint Permit Application. The thirty (30) day comment period remained open until December 1, 2025.

On February 3, 2026, DEP conducted a virtual public hearing during which PGE provided additional information about the Proposed Project and the alternate routes that were evaluated. Public testimony was recorded and added as part of the Joint Permit Application documents.

This comment response document contains the 171 public comments submitted to DEP since the receipt of the Applications, including the thirty (30) day Pennsylvania Bulletin comment period for the Joint Permit Application. The following pages contain the submitted comments and DEP’s responses. Comments are listed with identifying Commentor ID number and all pertinent responses.

A complete listing of the comments can be found at the end of this document in Appendix A.

Comments in Support

Comment 1: This application is an example of natural gas development and environmental stewardship coexisting. These two things are not and do not have to be mutually exclusive. We can safely develop natural gas in Pennsylvania while protecting the environment. The opportunities natural gas has brought working families, communities, and the state cannot be understated. For all the reasons stated, we encourage the Pennsylvania Department of Environmental Protection to approve PGE's joint permit application. (33, 154)

Response: The Proposed Project proposes to construct a permanent access road and staging area along the ridge above Jacoby Falls and Jacoby Falls trail approximately 1500 horizontal feet and 550 vertical feet away from Jacoby Falls at the nearest point. PGE submitted information confirming the roadway follows an existing access road corridor and proposes minimal tree clearing. The Department has reviewed the Applications and the responses and revisions submitted in response to technical deficiencies in accordance with the Chapter 102 and Chapter 105 regulations.

Ultimately, the DEP determined that PGE's Applications failed to satisfy all criteria for issuing the required permits so that the Applications are denied. As detailed in the denial letters for the Applications, PGE failed to do the following: properly address the mitigation of all stream impacts, provide plans showing that the access road is properly graded in relation to the stream relocation and adjacent stormwater control measures, and provide clarification and detail concerning potential bridge design effects on the Proposed Project's limits.

General Opposition

Comment 2: I am opposed to this project and any additional development in this area. (1-7, 9, 10, 12-15, 17-24, 26-30, 32, 34-44, 46-51, 53-71, 72-83, 85-99, 101, 103-134, 136, 138-153, 156, 158, 161, 164, 167, 168-170)

Response: The Department acknowledges the commentator's comment regarding the Proposed Project. Ultimately, the DEP determined that PGE's Applications failed to satisfy all criteria for issuing the required permits, including conditions in 25 Pa. Code § 105.21 (relating to Criteria for permit issuance and denial), so that the Applications are denied. As detailed in the denial letters for the Applications, PGE failed to do the following: properly address the mitigation of all stream impacts, provide plans showing that the access road is properly graded in relation to the stream relocation and adjacent stormwater control measures, and provide clarification and detail concerning potential bridge design effects on the Proposed Project's limits.

25 Pa. Code § 105.18a(c)

Comment 3: Under DEP's regulations, which are the focus of this hearing, 25 Pa. Code section 105.18a, subsection (c), states that DEP cannot issue a permit for a project that "has a significant adverse impact on a wetland" unless the "project is necessary to abate a substantial threat to public health or safety." PGE's permit application demonstrates that its proposed Saluda Project will have a significant adverse impact on unique exceptional value wetlands that are part of a constitutionally protected forest that DEP and DCNR must conserve and maintain as trustees. (20, 23, 25-26, 28-29, 31-32, 37-39, 47, 60, 66, 69, 109, 137, 155, 166, 169, 171)

Response: DEP thoroughly reviewed the Joint Permit Application for the Proposed Project for compliance with 25 Pa. Code §105.18a(a) (relating to Permitting of structures and activities in wetlands) and considered the public input received for the Proposed Project. Additionally, DEP coordinated with the PAFBC, USFWS, PGC, and the DCNR. Each agency was afforded an opportunity to provide input and a decision regarding whether PGE qualified

for the issuance of a permit(s). Based upon this thorough process, the DEP concluded that the Proposed Project will not result in adverse impacts to exceptional value wetlands due to the Proposed Project mitigation measures detailed in the Joint Permit Application. The Joint Permit Application reflects avoidance and minimization of impacts to the wetlands including antidegradation best available combination of technologies best management practices (“ABACT BMPs”). The ABACT BMPs include, among other things, filter sock, limited disturbance, alternative siting and configuration, etc. PGE has also included compensatory mitigation that includes on-site replanting and restoration as well as off-site mitigation.

Ultimately, the DEP determined that PGE’s Applications failed to satisfy all criteria for issuing the required permits so that the Applications are denied. As detailed in the denial letters for the Applications, PGE failed to do the following: properly address the mitigation of all stream impacts, provide plans showing that the access road is properly graded in relation to the stream relocation and adjacent stormwater control measures, and provide clarification and detail concerning potential bridge design effects on the Proposed Project’s limits.

Aesthetic Impact

Comment 4: Jacoby Falls is a treasured natural feature within the forest, valued for its scenic beauty, ecological importance, and the quiet, immersive experience it offers visitors. Allowing fracking operations so close to this area would fundamentally alter and degrade that experience. Fracking well pads and associated infrastructure are loud, industrial operations that generate constant noise, truck traffic, and persistent odors from emissions and leaks. These impacts are incompatible with a protected forest environment and would effectively destroy the peaceful, natural character of Jacoby Falls. Beyond the loss of recreational and aesthetic value, the proximity of fracking to Jacoby Falls raises serious environmental concerns. The area relies on clean water and intact forest ecosystems. Industrial drilling so close to a waterfall and its surrounding watershed increases the risk of water contamination, erosion, habitat fragmentation, and long-term ecological damage that cannot be undone. (8, 11, 16-18, 45, 51, 74, 75, 109, 137, 140, 142, 146, 159, 161, 162, 165, 167)

Response: The Proposed Project proposes to construct a permanent access road and staging area along the ridge above Jacoby Falls and Jacoby Falls trail approximately 1500 horizontal feet and 550 vertical feet away from Jacoby Falls at the nearest point. PGE submitted information confirming the roadway follows an existing access road corridor and proposes minimal tree clearing. The Joint Permit Application reflects avoidance and minimization of impacts to the wetlands including ABACT BMPs. The ABACT BMPs include, among other things, filter sock, limited disturbance, alternative siting and configuration, etc. Additionally, PGE has also included compensatory mitigation that includes on-site replanting and restoration as well as off-site mitigation. PGE must also comply with all federal, state, and local statutes, regulations, and ordinances. This would include complying with local noise ordinances, local land use ordinances, and zoning laws. The DEP has reviewed the Applications and PGE’s responses and revisions concerning the DEP’s identified technical deficiencies in accordance with the Chapter 102 and Chapter 105 regulations.

Ultimately, the DEP determined that PGE’s Applications failed to satisfy all criteria for issuing the required permits so that the Applications are denied. As detailed in the denial letters for the Applications, PGE failed to do the following: properly address the mitigation of all stream impacts, provide plans showing that the access road is properly graded in relation to the stream relocation and adjacent stormwater control measures, and provide clarification and detail concerning potential bridge design effects on the Proposed Project’s limits.

Alternatives Analysis

Comment 5: Please consider siting drilling pads and associated infrastructure on adjacent private lands, not State Forest Lands, in order to access the subject gas lease area without any surface disturbance to State Forest Lands or EV waters. (13, 20, 23, 26, 28, 29, 31, 32, 37-39, 47-51, 54, 57, 58, 66, 71, 101, 113, 130, 135, 136, 141, 148, 149, 153, 155, 171)

Response: The alternatives analysis section of the Joint Permit Application outlines PGE's attempts to locate the Proposed Project elsewhere. The Proposed Project's limitations relating to local zoning, geologic restrictions, and lease holding limitations have restricted the Proposed Project to this Pennsylvania State Forest tract. The alternatives analysis also detailed alternative routes for access via Butternut Grove Road and alternative alignments of the proposed route. The proposed route is detailed to be the least environmentally damaging alternative as demonstrated in PGE's alternatives analysis. The Proposed Project does not qualify for eminent domain and permits issued do not convey property rights from landowners. The DEP has undertaken a thorough evaluation of the application and found that the proposed action satisfies the regulatory requirements.

Ultimately, the DEP determined that PGE's Applications failed to satisfy all criteria for issuing the required permits so that the Applications are denied. As detailed in the denial letters for the Applications, PGE failed to do the following: properly address the mitigation of all stream impacts, provide plans showing that the access road is properly graded in relation to the stream relocation and adjacent stormwater control measures, and provide clarification and detail concerning potential bridge design effects on the Proposed Project's limits.

Article I, Section 27

Comment 6: According to the PA. gov website under Environmental Heritage, Article 1, Section 27 of the PA Constitution was ratified on 5/18/1971. The website states, "Pennsylvania's public natural resources are the common property of all the people, including generations yet to come. As trustee of these resources, the Commonwealth shall conserve and maintain them for the benefit of all the people." Aren't we in direct violation of the constitution if public land in the Loyalsock State Forest is not conserved?? (9, 11, 12, 20, 23, 25, 26, 28, 29, 31, 32, 35, 37-39, 45, 47, 60, 66, 76, 100, 109, 128, 132, 135, 137, 141, 150, 158, 166, 167, 171)

Response: DEP's mission includes conserving and maintaining Pennsylvania's clean air, pure water, and preserving the natural values of the environment while ensuring the health and safety of all residents and visitors to Pennsylvania. In implementing its responsibility as a trustee while reviewing the Applications, the DEP took into consideration the public's right to protection of public natural resources. This is consistent with the Clean Streams Law, Act of June 22, 1937, P.L. 1987, as amended, 35 P.S. §§691.1-691.1001 ("Clean Streams Law"). The Clean Streams Law recognizes that clean, unpolluted streams are essential to Pennsylvania to both have outdoor recreational facilities for decades into the future and to attract new manufacturing industries. 35 P.S. § 691.4.

DEP thoroughly reviewed the Application for compliance with applicable constitutional, statutory and regulatory requirements, coordinated with other Article I, Section 27 trustees such as the PAFBC, USFWS, PGC, and the DCNR, and considered the public input received for the Proposed Project. Based upon this thorough process, as well as the Proposed Project's specific terms and conditions of the permits, the DEP concluded that the Proposed Project will not result in unreasonable degradation of public natural resources consistent with Article I, Section 27 of the Pennsylvania Constitution. The Applications reflect avoidance and minimization of impacts, provide reasonable protection for public health and safety and the environment, and adequately mitigate the impacts to the public natural resources.

Ultimately, the DEP determined that PGE's Applications failed to satisfy all criteria for issuing the required permits, including the condition in 25 Pa. Code § 105.21 (relating to Criteria for permit issuance and denial), so that

the Applications are denied. As detailed in the denial letters for the Applications, PGE failed to do the following: properly address the mitigation of all stream impacts, provide plans showing that the access road is properly graded in relation to the stream relocation and adjacent stormwater control measures, and provide clarification and detail concerning potential bridge design effects on the Proposed Project's limits.

Baseline Monitoring

Comment 7: Has or will pre-project baseline water quality and aquatic life monitoring take place in the EV springs and streams impacted by the proposed project? (8)

Response: The Department does not routinely collect targeted baseline biological or physicochemical data as part of project review or permit issuance. PGE's Erosion and Sediment Control Plan and the terms and conditions of the Erosion and Sediment Control Permit for Earth Disturbance Associated with Oil and Gas Exploration, Production, Processing, or Treatment Operations or Transmission Facilities identifies the erosion and sediment ("E&S") controls, stormwater management, and restoration practices to be implemented during and after the Proposed Project's construction for all earth disturbance activities associated with the Proposed Project. Furthermore, PGE has also provided ABACT E&S BMPs for this special protection watershed. However, some engineering design concerns were identified and are discussed in the engineering record of decision detailing that the application does not provide appropriate measures to mitigate for accelerated erosion and stormwater runoff from earth disturbance activities. Chapter 102 regulations are in place to ensure that stormwater discharge from construction activities will not cause or contribute to violations of water quality standards.

Ultimately, the DEP determined that PGE's Applications failed to satisfy all criteria for issuing the required permits so that the Applications are denied. As detailed in the denial letters for the Applications, PGE failed to do the following: properly address the mitigation of all stream impacts, provide plans showing that the access road is properly graded in relation to the stream relocation and adjacent stormwater control measures, and provide clarification and detail concerning potential bridge design effects on the Proposed Project's limits.

Compliance History

Comment 8: There are no fines or punitive actions that have ever stopped the pollution. No CEOs or managers ever go to jail or pay the personal price for such negligence. Therefore, the only real preservation action to protect our wild spaces is to never give these industries the opportunity to continue their careless and sloppy industrial pollution. (5, 20, 22, 32, 35, 155)

Response: The compliance history of PGE was considered in the review of the applications. Based on this review, PGE is not in violation of a final administrative action by the Department that would preclude the issuance of the permits. Its operations are either in compliance, or they are making satisfactory efforts to achieve compliance at their sites. After review with the Compliance Section, it has been determined that PGE has not shown a pattern of noncompliance. However, the DEP determined that PGE's Applications failed to satisfy all criteria for issuing the required permits so that the Applications are denied. As detailed in the denial letters for the Applications, PGE failed to do the following: properly address the mitigation of all stream impacts, provide plans showing that the access road is properly graded in relation to the stream relocation and adjacent stormwater control measures, and provide clarification and detail concerning potential bridge design effects on the Proposed Project's limits.

Degradation/EV Waters/Cumulative Impact

Comment 9: Our (PATU) concerns are a significant loss of DCNR forest resources, potential degradation of Exceptional Value (EV) waters, and loss of esthetic wild forest recreational values. (5, 8, 11, 13-26, 28-30, 32, 34-35, 37-41, 47-49, 51-52, 54, 56, 57, 59-64, 66, 69-71, 76-77, 82-84, 88-93, 97-102, 104, 106, 108-115, 117, 120-121, 127-128, 130-137, 140-141, 144, 146-150, 153, 155, 157, 162, 164, 166-167, 169, 171)

Response: The DEP has reviewed the Applications and the responses and revisions submitted in response to the DEP's identified technical deficiencies in accordance with Chapter 102 and Chapter 105 regulations. The DEP evaluates cumulative impacts during its review of an applicant's Joint Permit Application in accordance with Pennsylvania regulations, including Title 25 Pa. Code Chapters 93, 102, and 105. Based on that review, the DEP has determined that PGE has not satisfactorily demonstrated compliance with all the regulatory requirements in Chapter 102 and Chapter 105. As detailed in the denial letters for the Applications, PGE failed to do the following: properly address the mitigation of all stream impacts, provide plans showing that the access road is properly graded in relation to the stream relocation and adjacent stormwater control measures, and provide clarification and detail concerning potential bridge design effects on the Proposed Project's limits.

Edge Effect/Fragmentation

Comment 10: A new 3.9-mile permanent road fragments core forest habitat into smaller patches and creates a linear edge that changes temperature, moisture, wind exposure, and predator dynamics. Fragmentation reduces interior forest habitat needed by sensitive birds and mammals, increases nest predation and parasitism in edge environments, disrupts movement corridors, increases wildlife-vehicle collisions, and degrades the ecological integrity that Pennsylvanians rely on in public forests. These impacts are structural and lasting, they persist long after construction. (21, 22, 30-32, 34, 45, 59, 76, 80, 121, 129, 132, 137, 147, 156, 159, 164, 168)

Response: PGE submitted information confirming the roadway follows an existing access road corridor and proposes minimal tree clearing. The DEP has reviewed the Applications and the responses and revisions submitted in response to the DEP's identified technical deficiencies in accordance with Chapter 102 and Chapter 105 regulations. While the DEP does not directly regulate the cutting of trees in upland areas, application reviews evaluate the secondary and cumulative impacts of the Proposed Project in accordance with Pennsylvania regulations, including Title 25 Pa. Code Chapters 93, 102, and 105. PGE must also comply with all federal, state, and local statutes, regulations, and ordinances.

Ultimately, the DEP determined that PGE's Applications failed to satisfy all criteria for issuing the required permits so that the Applications are denied. As detailed in the denial letters for the Applications, PGE failed to do the following: properly address the mitigation of all stream impacts, provide plans showing that the access road is properly graded in relation to the stream relocation and adjacent stormwater control measures, and provide clarification and detail concerning potential bridge design effects on the Proposed Project's limits.

Invasive Species

Comment 11: New road corridors are well-known vectors for invasive plant introduction and spread due to disturbed soils, vehicle traffic, and maintenance regimes. Invasives can displace native understory communities, reduce biodiversity, and change fire and habitat dynamics. (21-22, 59, 121, 129, 137)

Response: The Proposed Project proposes restoration of the land that is disturbed by the development of the Proposed Project, ABACT BMPs, and specific construction methods to minimize stream impacts including minimizing the right of way width and replanting riparian forest buffers, where practicable, within the construction

right of way. DCNR has also provided BMPs within the Applications detailing methods for minimizing the introduction of, monitoring for, and treatment of invasive species as needed.

Ultimately, the DEP determined that PGE's Applications failed to satisfy all criteria for issuing the required permits so that the Applications are denied. As detailed in the denial letters for the Applications, PGE failed to do the following: properly address the mitigation of all stream impacts, provide plans showing that the access road is properly graded in relation to the stream relocation and adjacent stormwater control measures, and provide clarification and detail concerning potential bridge design effects on the Proposed Project's limits.

Noise & Traffic

Comment 12: Extensive drilling for natural gas and the development of related infrastructure degrades our state forest lands and poses a significant threat to birds and other wildlife that depend upon forested habitat. Fragmentation of contiguous forest lands, as well as noise from construction and drilling and hauling operations, threatens birds and other wildlife, and reduces the recreational value of forest lands. (15, 17-18, 20, 21, 22, 30, 51, 76, 137, 147, 156, 164, 167)

Response: While noise is not regulated through Department regulations, any local ordinances would be reviewed as part of zoning. PGE must also comply with all federal, state, and local statutes, regulations, and ordinances. This would include complying with local noise ordinances, local land use ordinances, and zoning laws. The Proposed Project proposes constructing a permanent access road and staging area along the ridge above Jacoby Falls and Jacoby Falls trail approximately 1500 horizontal feet and 550 vertical feet away from Jacoby Falls at the nearest point. PGE submitted information confirming the roadway follows an existing access road which was previously and will remain gated to the public and be used solely by the DCNR and PGE vehicle traffic. The Joint Permit Application demonstrates that the proposed route is the least environmentally damaging alternative. The proposed route was developed in consultation with the DCNR and includes the least amount of disturbed acreage while balancing small route variations to avoid and minimize impacts to aquatic resources along the route. The Proposed Project does not qualify for eminent domain and permits issued do not convey property rights from landowners. Please see the DEP's response under the heading "Public Lands/Recreation" for its response concerning the recreational value of the forest lands.

Ultimately, the DEP determined that PGE's Applications failed to satisfy all criteria for issuing the required permits so that the Applications are denied. As detailed in the denial letters for the Applications, PGE failed to do the following: properly address the mitigation of all stream impacts, provide plans showing that the access road is properly graded in relation to the stream relocation and adjacent stormwater control measures, and provide clarification and detail concerning potential bridge design effects on the Proposed Project's limits.

PA Wilds/Sensitive Environment

Comment 13: I value the wild areas of Pennsylvania, including the streams, wetlands, forests, meadows and wildlife inhabitants that call these areas home. I fear that this project will not only disturb those wild areas and its inhabitants, but also those visitors who enjoy Pennsylvania's outdoor experiences. (3, 5, 6-12, 21, 22, 24, 26, 28, 29, 35, 37-40, 45, 47-50, 52, 56-58, 66, 69, 71, 113, 115, 121, 130, 131, 136, 137, 143, 148-150, 153, 157)

Response: The DEP reviewed the Applications and responses and revisions submitted in response to the DEP's identified technical deficiencies in accordance with Chapter 102 and Chapter 105 regulations. The DEP evaluates cumulative impacts during its review of an applicant's Joint Permit Application in accordance with Pennsylvania regulations including Title 25 Pa. Code Chapters 93, 102, and 105. Ultimately, the DEP determined that PGE's Applications failed to satisfy all criteria for issuing the required permits so that the Applications are denied. As detailed in the denial letters for the Applications, PGE failed to do the following: properly address the mitigation of all stream impacts, provide plans showing that the access road is properly graded in relation to the stream relocation

and adjacent stormwater control measures, and provide clarification and detail concerning potential bridge design effects on the Proposed Project's limits.

Public Hearing Request

Comment 14: I am requesting a public hearing to have our questions and concerns addressed along with other stakeholders. (3, 5, 7-12)

Response: A public hearing was held on February 3, 2026, during which PGE provided additional information about the Proposed Project. Public testimony was recorded and added as part of the Joint Permit Application documents.

Public Lands/Recreation

Comment 15: The proposed first pad and road to and from it, if built where shown by PGE, will cut off public access use of a popular upland hunting and hiking area primitive forest road (Dad-Dad Chapman Road) and hiking route down to popular Jacoby Falls located just down the steep mountainside from the pad. (2-5, 8-20, 23-26, 28-32, 34-35, 37-41, 45, 47-52, 54-59, 64-68, 71, 76, 80-81, 85, 94-97, 100-101, 109-111, 113, 115-116, 118, 120-121, 129-130, 134, 136-137, 138, 140-141, 146-151, 153, 158-161, 163, 165-168, 170-171)

Response: The Proposed Project proposes to construct a permanent access road and staging area along the ridge above Jacoby Falls and Jacoby Falls trail approximately 1500 horizontal feet and 550 vertical feet away from Jacoby Falls at the nearest point. PGE submitted information confirming the roadway follows an existing access road which was previously and will remain gated to the public and be used solely by the DCNR and PGE vehicle traffic. The application materials demonstrate that the proposed route is the least environmentally damaging alternative. The proposed route was developed in consultation with DCNR and includes the least amount of disturbed acreage while balancing small route variations to avoid and minimize impacts to aquatic resources along the route. The Proposed Project does not qualify for eminent domain and permits issued do not convey property rights from landowners.

Ultimately, the DEP determined that PGE's Applications failed to satisfy all criteria for issuing the required permits so that the Applications are denied. As detailed in the denial letters for the Applications, PGE failed to do the following: properly address the mitigation of all stream impacts, provide plans showing that the access road is properly graded in relation to the stream relocation and adjacent stormwater control measures, and provide clarification and detail concerning potential bridge design effects on the Proposed Project's limits.

Trustee Duty of Impartiality

Comment 16: The 3.9 mile road will involve 57 stream or wetland crossings, which is unacceptable. The request is really outrageous and the fact that it is even being considered is further evidence of the disconnect between government and government-connected entities like the oil and gas industry and regular citizens. As a citizen, if I were to petition for a 3.9 mile road on my own property that crossed over 57 streams or wetlands I would be laughed out of the building. A hard NO from the get-go. And this would involve my own personal property. Extractive industries are proposing doing this very same thing on property they don't even own and it is being taken seriously. It is beyond crazy and hypocritical. (4, 5, 9-11, 20-21, 23, 25-26, 28-32, 37-39, 45, 47, 49, 60, 66, 71, 100, 109, 126, 137, 141, 148, 150, 158)

Response: The DEP reviewed the Application in a manner that is consistent with the constitutional obligations and in accordance with established laws, including the Clean Streams Law, Act of June 22, 1937, P.L. 1987, as amended, 35 P.S. §§ 691.1-691.1001, the Dam Safety and Encroachments Act, Act of November 26, 1978, P.L. 1375, as amended, 32 P.S. §§ 693.1-693.27, and Pennsylvania regulations, including Title 25 Pa. Code Chapters 93,

102 and 105. Ultimately, the DEP determined that PGE's Applications failed to satisfy all criteria for issuing the required permits so that the Applications are denied. As detailed in the denial letters for the Applications, PGE failed to do the following: properly address the mitigation of all stream impacts, provide plans showing that the access road is properly graded in relation to the stream relocation and adjacent stormwater control measures, and provide clarification and detail concerning potential bridge design effects on the Proposed Project's limits.

Wild Trout Stream

Comment 17: Our (PATU) concerns are a significant loss of DCNR forest resources, potential degradation of Exceptional Value (EV) waters, and loss of esthetic wild forest recreational values. The road will traverse EV upland springs and ravine headwaters that drop down into Jacoby and Bar Bottom hollows which harbor wild trout and are popular scenic and unique wild hiking areas. (8, 11, 15, 16, 20, 22-26, 28, 29, 34, 37-40, 45, 47, 56, 66, 67, 81, 141, 143, 157, 161, 163, 168, 171)

Response: The alternatives analysis section of application materials outlines the Proposed Project's limitations relating to local zoning, geologic restrictions, and lease holding limitations that have restricted the Proposed Project to this PA State Forest tract. The alternatives analysis also details alternative routes for access via Butternut Grove Road and alternative alignments of the proposed route. The Proposed Project proposes restoration of existing culverts, ABACT BMPs, and replacement of some existing culverts with bridge spans that will restore stream connectivity in these areas. The proposed route is detailed to be the least environmentally damaging alternative.

The Joint Permit Application was also reviewed in coordination with the PAFBC Fisheries Biologists to address concerns specifically related to the PAFBC's coverage of Commonwealth aquatic resources. The PAFBC recommended special conditions to restrict construction timeframes to outside of spawning, egg deposition, incubation, and fry emergence life stages of the wild trout population.

The DEP has reviewed the applications and determined that remaining deficiencies exist. Therefore, the DEP determined that PGE's Applications failed to satisfy all criteria for issuing the required permits so that the Applications are denied. As detailed in the denial letters for the Applications, PGE failed to do the following: properly address the mitigation of all stream impacts, provide plans showing that the access road is properly graded in relation to the stream relocation and adjacent stormwater control measures, and provide clarification and detail concerning potential bridge design effects on the Proposed Project's limits.

Appendix A – Commentors List

#	FIRST NAME	LAST NAME	ADDRESS	CITY	STATE ZIP CODE	ORGANIZATION	EMAIL
1	Henry	Frank					
2	Nathan	B.					
3	Luke	Shultz					
4	Jay	Rowan					
5	Bryson	Peterman					
6	John	Kidd					
7	Cindy	Bower					
8	Brian	Wagner					
9	Brook	Lenker					
10	Dana	Driscoll					
11	Ralph	Kisberg					
12	Ryan	Bahr					
13	Barbara	Estomin					
14	Jeff	Michell					
15	Jade	Cordrey					
16	Olivia	Morgan					
17	Steve	Miller					
18	Christina	Miller					
19	Mary Ann	Stanton					
20	Barbara	Jarmoska					
21	Ann	House					
22	Chef Hosch						
23	Bailey	Gavitt					
24	Gail	Kulp					

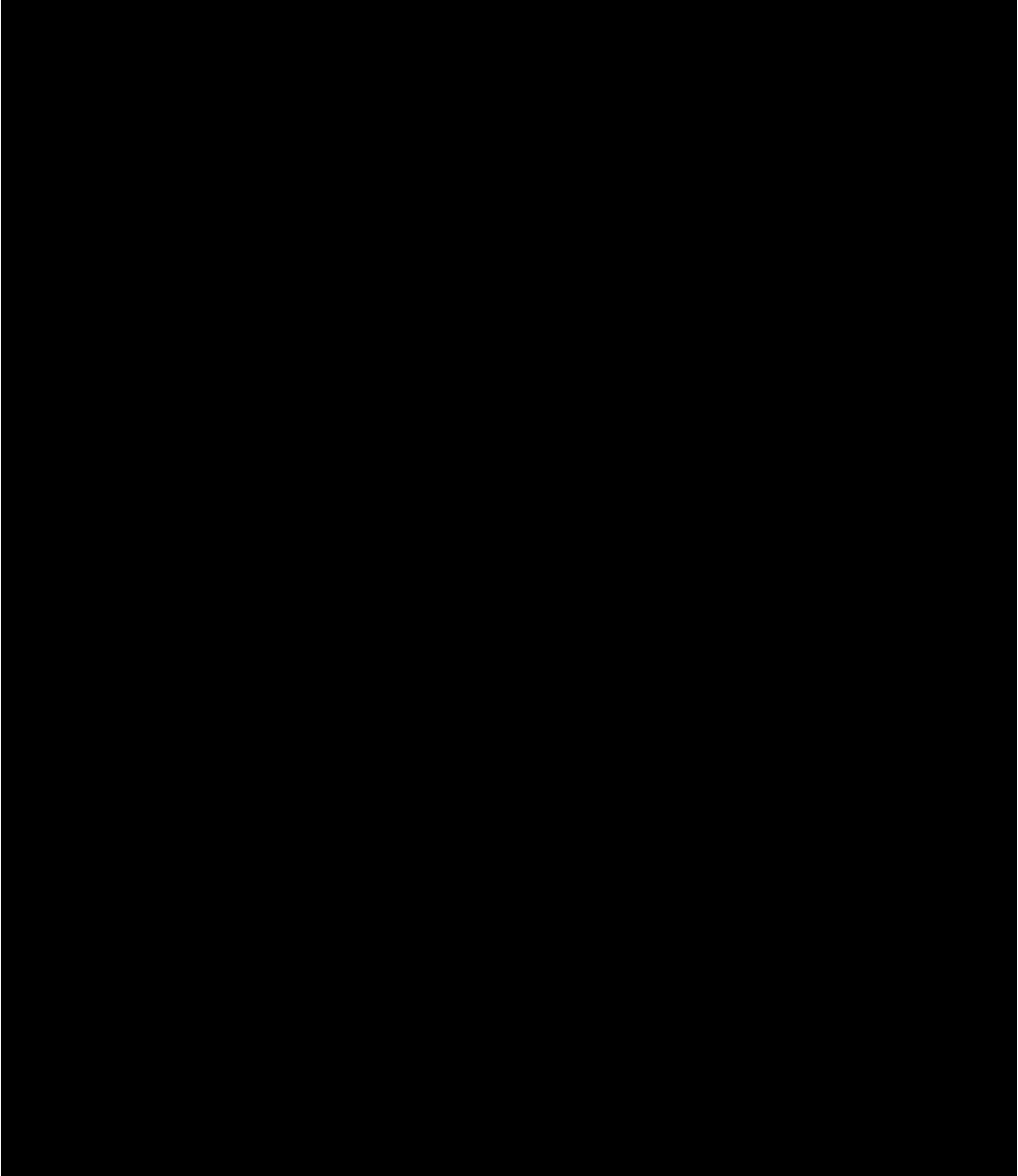
25	Morgan	Gavitt
26	Ryan	Bahr
27	Soren	Ashman
28	Abby	H.
29	Valerie	Ammar-Khodja
30	Bruce	Buckle
31	Cynthia	Bower
32	Brian	Wagner
33	Dan	Hagan
34	Sydney	Kilburn
35	Ann	Pinca
36	Gabriel	Greenway
37	Pat	Nardi
38	Michael	Hill
39	Brooke	Osborne
40	Lisa	Oser
41	Ava	Lindsay
42	Hello	
43	ESS	
44	Carlee	Kneasel
45	Tracy	Cole
46	Thomas	McGarry
47	Josh	Bahr
48	Nate	Wilson
49	Zachary	Lyon
50	Cortny	Geise

51	Lauren	Bahr					
52	Beth	Jones					
53	Karen	Hogenboom					
54	Kevin	Williams					
55	Matt	Reutlinger					
56	Gail	Kulp					
57	Jacob	Casey					
58	Melissa	Lyon					
59	Emily	Bohlin					
60	Poune	Saberi					
61	Juliana	Flower					
62	Julia	Kasdorf					
63	Kevin	Eck					
64	John	Tewksbury					
65	Judy	Steinhilper					
66	Brock	Stroup					
67	Rose	Risso					
68	Karen	Kirk-Newman					
69	Divia	Feinstein					
70	Alannah	Gabriel					
71	Travis	Bickmore					
72	Andy	Middleton					
73	Jsgro77						
74	Breanna	Welty					
75	Brette	Confair					
76	Chelsea	Cramer					
77	Penny	Lutz					
78	Karl	Zimmerman					

79	Bob	Lucus					
80	Morgan	Benowitz-Fredricks					
81	Susan	Jordan					
82	Matt	McTammany					
83	Elizabeth	Capaldi					
84	Mizuki	Takahashi					
85	Charles	Steffen					
86	Tasha	Hall					
87	Tom	Boyd					
88	Kathi	Hannaford					
89	Julie	Gates					
90	Lissa	Ray					
91	Lissa	Ray					
92	Jayne	Kubat					
93	Gloria	Renehan					
94	Sara Jane	Snyder					
95	Gloria	Miele					
96	Jon T.R.	Droege					
97	Robert	Cross					
98	Heidi	Walker					
99	Caitlin	Obrien					
100	Tom	Duck					
101	Allison	Mosher					
102	Sarah	Caspar					
103	Mark	Spiro					
104	David	LaVerne					
105	Chris	Benson					

106	Victoria	Switzer									
107	Isabelle	Genest									
108	Jennifer	Brown									
109	B.	Arrindell									
110	Dr. Jenni	Slotterback									
111	Carol	Troisi									
112	Dr. Karen	Elias									
113	Madison	Cannon									
114	Lynn	Fiedler									
115	Casey	O'Neill									
116	Isabela	Salazar									
117	Chase	Bottorf									
118	Janis	Winschuh									
119	Marie	Simspon									
120	James	Wood									
121	Lena	Yeagle									
122	Sally	S.									
123	Michelle	Rupert									
124	Andrea	Silverstrim									
125	Michelle	Rupert									
126	Michael	Heyd									
127	Heather	Adams									
128	Linda	Stanley									
129	Rebecca	Cardin									
130	Tina	Mccafferty									
131	Mary	O'Donnell									
132	James	Gardner									
133	Robyn	Diakite									

134	Jon	Engel					
135	Karen	Frock					
136	Brett	Renninger					
137	Tonyehn	Verkitus					
138	Emily	Krafjack					
139	John	Lorson					
140	Karen	Howes					
141	Ralph	Kisberg					
142	Robert	Middleton					
143	John	Zaktansky					
144	Holly	Shull					
145	Margaret	Lauver					
146	Ellen	Davis					
147	Reils	Shera					
148	Melissa	Farenish					
149	Tom	Gebbie					
150	James	Rowe					
151	Brooke	Woodside					
152	Ann	Russell					
153	Emily Marie						
154	Dan	Hagan					
155	Ralph	Kisberg					
156	Bruce	Buckle					
157	Barbara	Jarmoska					
158	Cynthia	Bower					
159	Beth	Jones					
160	Mary Ann	Stanton					



161	Christine	Bear
162	Bridget	Irwin
163	Ryan	Bahr
164	Lauren	Bahr
165	Aaron	Deffenbaugh
166	Margaret	Cronin
167	Brook	Lenker
168	Gary	Metzger
169	Ruth	Steck
170	Aiden	Gscheidle
171	Brian	Wagner



Appendix B - List of all Comments

Comment 1: Henry Frank

I oppose the proposed 3.9-mile shale gas access road and staging area inside Loyalsock State Forest.

Comment 2: Nathan B.

Not on our land: A new 3.9-mile shale gas access road and staging area is proposed inside Loyalsock State Forest.

Comment 3: Luke Shultz

I'm writing to express my concern over the proposed 3.9 mile gas access road and staging area for the Loyalsock State Forest. I value the wild areas of Pennsylvania, including the streams, wetlands, forests, meadows and wildlife inhabitants that call these areas home. I fear that this project will not only disturb those wild areas and its inhabitants, but also those visitors who enjoy Pennsylvania's outdoor experiences.

My concerns, and those of other outdoor enthusiasts and residents should be considered. These are public lands; our lands. And I believe the conservation of these wild areas far outweighs the temporary gain from extracted gas and permanent damage to the land.

At the very least, public hearings should be held to gauge support or concerns for this project.

Comment 4: Jay Rowan

I am strongly against allowing this to go forward. The 3.9 mile road will involve 57 stream or wetland crossings, which is unacceptable. The request is really outrageous and the fact that it is even being considered is further evidence of the disconnect between government and government-connected entities like the oil and gas industry and regular citizens. As a citizen, if I were to petition for a 3.9 mile road on my own property that crossed over 57 streams or wetlands I would be laughed out of the building. A hard NO from the get-go. And this would involve my own personal property. Extractive industries are proposing doing this very same thing on property they don't even own and it is being taken seriously. It is beyond crazy and hypocritical.

Oil and gas entities need a rude lesson in playing by the rules. No one would be allowed to construct such a road under the law as applied to the citizenry in general, so why should these guys get a pass? Maybe the access piece of getting at the resource they were granted permission to extract should have all been grouped as one request, no? An access issue for the oil and gas companies doesn't mean that the citizens of PA need to sacrifice a natural resource to solve it. Any inability to get at something procured earlier is their problem, and their problem alone, not mine or other PA residents' problem. So absolutely NO to the access road. Thank you.

Comment 5: Bryson Peterman

I and my family of five vehemently oppose a new 3.9-mile shale gas access road and staging area proposed inside Loyalsock State Forest (Lycoming County). This development will directly impact trails, wildlife habitat, forest recreation, and the quiet backcountry experiences we value. I respectfully request a public hearing to ensure voices are heard besides those who rape the Earth for profit. These wells, fracking pads, pipelines ALL routinely pollute our ground water, creeks, streams, state parks, state forests and the PA Wilds. There are no fines or punitive actions that have ever stopped the pollution. No CEOs or managers ever go to jail or pay the personal price for such negligence. Therefore, the only real preservation action to protect our wild spaces is to never give these industries the opportunity to continue their careless and sloppy industrial pollution. Again, we oppose a new shale gas (fracking) access road and request a public hearing.

Comment 6: John Kidd

I am highly opposed to the proposed shale gas road in Loyalsock State. It is threatening to a sensitive environment and very irresponsible to even consider this proposal.

Comment 7:

Voice message and Chris Mileto spoke with commenter. Requested a copy of the application, expressed opposition to the project, and requested a public hearing be held. Emailed permit package and plans on 12/3/2025.

Comment 8: Brian Wagner

Please see the attached comments and request for a public hearing from Pennsylvania Council of Trout Unlimited pertaining to the application from Pennsylvania General Energy, Co. LLC to construct, operate and maintain twenty (20) permanent stream crossings, nineteen (19) temporary stream crossings, eight (8) permanent wetland crossings and ten (10) temporary wetland crossings in Gamble and Cascade Townships, Lycoming County. The work involves the construction of a permanent access road and staging area.

Comment 9: Brook Lenker

Dear PA DEP Officials,

Keystone Trails Association (KTA) is a nonprofit organization with a mission to protect, preserve, provide, and promote hiking trails and hiking opportunities in Pennsylvania. Since 1956, we have served a statewide voice on hiking matters. We represent thousands of members and followers from across the commonwealth. Our work is rooted in the conservation, stewardship, and responsible enjoyment of Penn's Woods.

KTA respectfully requests the Department of Environmental Protection to schedule public hearing on Pennsylvania General Energy Company's Chapter 105 encroachment permit for a 3.9-mile shale gas well pad development access road and staging area in the Loyalsock State Forest in Gamble and Cascade Townships, Lycoming County as published in the Pennsylvania Bulletin, Volume 55 Number 44, page 7651 on Saturday, November 1, 2025. As stated, the permit will authorize the construction, operation and maintenance of twenty (20) permanent stream crossings, nineteen (19) temporary stream crossings, eight (8) permanent wetland crossings and ten (10) temporary wetland crossings.

The Loyalsock State Forest is a treasured natural resource, beloved by hikers and other recreationalists near and far. The famed and popular Loyalsock Trail, known for its scenic wonders, solitude, and quiet, meanders through these same forestlands. Modern natural gas development is incongruent with forest values and contradictory to conservation objectives of the PA DCNR. This specific proposal is especially detrimental to the environment and to the backcountry hiking experience. Its scale and impact are quite consequential.

The area contains sensitive hydrology, aquatic ecosystems, and terrestrial biota vulnerable to the degradation implicit in the proposed development activities, the effects of which cannot be merely mitigated. The solution is to deny these activities or locate them elsewhere. They do not belong in a public forest as Article 1, Section 27 of the Pennsylvania Constitution well attests.

We adamantly request a public hearing on this matter to allow a proper vetting of the many concerning aspects of the project. Such a hearing is fully consistent with 25 Pa. Code §105.15 (Public Notice and Hearing) and with the Commonwealth's trustee obligations under the aforementioned environmental rights amendment to the PA constitution. At least thirty days public notice should be granted to allow time for the preparation of testimony and ample planning for attendance.

Comment 10: Dana Driscoll

I am writing in my strong opposition to the permits you are considering: Comments On A PA General Energy Chapter 105 Permit - For 3.9 Mile Shale Gas Well Pad Development Access Road, Staging Area In Loyalsock State Forest, Lycoming County which includes Twenty (20) permanent stream crossings, nineteen (19) temporary stream crossings, eight (8) permanent wetland crossings and ten (10) temporary wetland crossings.

Please hold a public hearing.

I am a person who is heavily involved in ecological education through the Pennsylvania School of Herbalism. This includes doing regular walks in our wild lands to identify plants, trees and mushrooms. I have long enjoyed Loyalsock State Forest! Loyalsock State Forest is one of the most ecologically diverse forests. There should be NO PERMITTING to frack these lands. This is public land. This land belongs to you and me. It does not belong to fracking companies who would destroy it.

You are the Department of Environmental protection! Can you please start protecting the environment? You keep ignoring citizens and continue to issue permits against the public good.

Do citizens have a voice? Does our voice matter? OR is it all about fracking and data centers? Please make it stop.

Comment 11: Responsible Drilling Alliance

Request for Public Hearing, submitted electronically:

The Responsible Drilling Alliance (RDA) is a registered 501(c)(3) conservation organization founded in Lycoming County in 2009 and dedicated to the protection of Pennsylvania's public lands and waters.

RDA respectfully requests the Department of Environmental Protection to schedule a public hearing on Pennsylvania General Energy Company's Chapter 105 encroachment permit for a 3.9-mile shale gas well pad development access road and staging area in the Loyalsock State Forest in Gamble and Cascade Townships, Lycoming County as published in the Pennsylvania Bulletin, Volume 55 Number 44, page 7651 on Saturday, November 1, 2025

As stated, the permit will authorize the construction, operation and maintenance of twenty (20) permanent stream crossings, nineteen (19) temporary stream crossings, eight (8) permanent wetland crossings and ten (10) temporary wetland crossings.

These Loyalsock woodlands, located at the top of Jacoby and Cove Mountains, include one of the most beloved hikes in Lycoming County. On any given summer day, children and adults alike can be seen cooling off in the waters of Jacoby Falls after the 1.6-mile trek to the 18-foot waterfall created by Jacoby Run, a native trout stream. In winter months, photographers and nature-lovers are treated to spectacular views of the frozen semicircular falls and rock formation. Other hikers approach the falls from the top by parking beside Butternut Grove Road and hiking along the old logging road known as Dad-Dad-Chapman. In addition to families and hikers, these woodlands are also beloved by hunters, cross-country skiers, bird waters, photographers, and all manner of outdoor enthusiasts. This treasured forest is part of Pennsylvania residents' common wealth, where access and enjoyment is guaranteed by Article 1, Section 27 of the Pennsylvania Constitution.

The state forest comprising COP tracts 723 and 724 also represents some of the Loyalsock's most ecologically diverse woodlands. The intact forest, natural hydrology, vernal pools, and cold-water habitats support native brook trout populations and a wide array of amphibians and aquatic invertebrates.

Because the Loyalsock Creek watershed carries the Commonwealth's highest water-quality designation, even small disturbances upstream result in cumulative impacts inconsistent with Pennsylvania's antidegradation standards.

The scope of this project—occurring on public trust lands within an EV watershed—clearly warrants a public forum that allows citizens, scientists, and affected stakeholders to present data and testimony. Holding such a hearing is fully consistent with 25 Pa. Code §105.15 (Public Notice and Hearing) and with the Commonwealth's trustee obligations under Article I, Section 27 of the Pennsylvania Constitution, which require protection of public natural resources for present and future generations.

We therefore urge the Department to:

1. Grant this request for a public hearing on PGE's Chapter 105 application, and
2. Provide at least thirty days' advance public notice of the hearing date and procedures for comment submission.

Thank you for considering this request and for your continued stewardship of Pennsylvania's waters and state forest lands.

Comment 12: Ryan Bahr

I am reaching out to request a public hearing on the subject of the 3.9 mile shave gas access road and staging area that is planning to be constructed in the Loyalsock State Forest. I am a local to the Montoursville area, and have spent much time in the Loyalsock State Forest hiking, fishing, and back country camping. This proposed project will have negative effects to the wildlife habitat, hydrology, and will cut off access to trails in the area. The state forest is not a place for the expansion of natural gas extraction practices as Article 1, Section 27 of the Pennsylvania Constitution well attests. I am concerned for the health and quality of my local state forest and the pristine streams that run through it not far from the proposed staging area. I request that these activities are denied or located elsewhere, not on our public land.

Comment 13: Barbara Lynn Estomin

[REDACTED] The natural beauty and unspoiled landscape of this area captivated me when I moved here for work in 1993 and is the primary reason I stayed here.. Jacoby Falls is a very special place to me and my family. I have hiked there with my husband, daughter and grandchildren. The main trail is an easy 1.6 mile hike that an older adult or children can enjoy that provides a spectacular view of one of the most beautiful falls in PA. The Dag- Dag Chatman trail provides access to the top of the mountain and to Jacoby Falls. The ecology of this unusual mountaintop wetland is a treasure with its springs, pools and abundant flora and fauna. It provides a living classroom for young hikers – my grandchildren included. Once this unique environment is gone, it is lost forever.

The Saluda Access Road project would allow 6 well pads and 90 wells in this unique environmental wetland. This is an illegal destruction of public lands. DEP Chapter 105 speaks to the preservation of our water, including the Loyalsock Creek stating there can be "No Degradation." The proposal itself talks about "minimizing degradation," indicating that they recognize there will be illegal degradation our environment with this project. I urge you to stop this destruction of this local, natural public trust.

There is another solution, which was used successfully to preserve the integrity of our beloved Rock Run and Rider Park. Pads located on private land with horizontal laterals and sublaterals could be used instead of drilling 6 pads and 90 wells on public land - that belongs to the people of PA – and destroying a unique and precious natural heritage. Please do not let this project go forward.

Comment 14: Jeff Mitchell

I'm writing to oppose granting a permit for this project. Jacoby Run and Bar Bottom Hollow are deep gorges with steep terrain. Road construction will result in erosion, run off, and sedimentation into these pristine streams. This project will also accelerate the introduction of invasive species, increased water temperature, and algae, further reducing water quality.

Both streams are beloved by hikers and anglers for their scenic beauty and trout. Public access to both is critical. Jacoby Run is famous for its waterfall. Bar Bottom Hollow has several waterfalls and bedrock pools. I hope DEP ensures every effort is made to protect these special places.

Comment 15: Jade Cordrey

I am writing because I am deeply concerned about Pennsylvania General Energy's proposal to drill near Jacoby Mountain and Jacoby Falls, and I strongly urge the Department of Environmental Protection to deny the Chapter 105 permit for this project.

PGE plans to drill 90 wells on six well pads, build a four-mile access road, create a staging area, and install a gas pipeline only 600 feet from Jacoby Falls. This kind of development would permanently change the landscape and ecology of Jacoby Mountain. Once this area is industrialized, there is no going back — the damage will last for decades.

I am especially worried about PGE's request to cross eight native trout streams. These streams are fragile, cold-water ecosystems that support wildlife, fishing, and clean water downstream. Crossing them puts the streams at risk for erosion, sediment buildup, and contamination, which would harm trout populations and everyone who depends on these waters for recreation and enjoyment.

This issue is personal to me. [REDACTED], and I have seen firsthand what PGE's operations have already done to our community. Roads that were once quiet and barely used are now traveled constantly by heavy industrial traffic. What used to be a peaceful place to live no longer feels that way. In one instance, PGE had to fix serious construction mistakes to prevent one of our garages from being lost when a road they built nearly collapsed over the bank. The surrounding land has been cleared, eroded, and damaged by runoff, and those changes are permanent. These impacts are real, visible, and felt every day by the people who live here.

Jacoby Mountain is also an important place for hiking, fishing, hunting, and enjoying the outdoors. These activities aren't just hobbies — they support local businesses and help define our community. Allowing more industrial development would mean fewer recreation opportunities and long-term harm to the local economy.

There are also real health and quality-of-life concerns. Increased truck traffic, noise, air pollution, and the risk of water contamination affect the people who live nearby. No community should have to give up clean air, clean water, and peace of mind for short-term corporate profit.

Jacoby Mountain and its watershed are special places that deserve protection. Based on the environmental damage, loss of recreation, and harm to the community, I strongly believe this project should not move forward.

For these reasons, the Pennsylvania Department of Environmental Protection should not issue the Chapter 105 permit to PGE due to the loss of recreation opportunities and the damage that will be done to the local watershed and forest.

Comment 16: Olivia Morgan

I am unable to attend the public hearing regarding PGE's application for the Saluda Access Road & Staging Area project, so I am submitting my statement with the requested information below:

- **Name:** Olivia Morgan
- **Address:** [REDACTED]
- **Email:** [REDACTED]
- **Permit Application:** Saluda Access Road and Staging Area
- **Statement:** While [REDACTED], [REDACTED] and visited Jacoby Falls on many occasions growing up and it is a must-do when I am home. Jacoby Falls deserves to be preserved for generations to come - not only is it beautiful, it is also a relatively accessible hike. It is a hike you can bring your friends and family on to nurture a love of nature. This hike taught me what it means to appreciate an ecosystem across seasons: the strong waterfall after a rain in spring, the trickle sprinkling the moss in summer, the steady stream surrounded by fall foliage, and the frozen icicles in winter. I object to the permitting of the "Saluda Access Road & Staging Area" which would cross native trout streams and cause environmental degradation to the area.

Comment 17: Steve Miller

As a lifelong PA resident who has enjoyed Jacoby falls in all seasons I am writing to formally express my strong opposition to any fracking or related disruption within the Loyalsock State Forest, but especially the proposed activities located approximately 600 feet from Jacoby Falls. These shale gas well pads completely alter the natural landscape with their visual blight both during the day and night due to their jarring presence and increased light pollution, the smell from extraction, and lastly the smell and sound from heavy truck activity.

Allowing fracking operations so close to this area would fundamentally alter and degrade the experience so necessary for Pennsylvanians that enjoy the solitude of Jacoby falls and surrounding Loyalsock State Forest.

Beyond the loss of recreational and aesthetic value, the proximity of fracking to Jacoby Falls raises serious environmental concerns. The area relies on clean water and intact forest ecosystems. Industrial drilling so close to a waterfall and its surrounding watershed increases the risk of water contamination, erosion, habitat fragmentation, and long-term ecological damage that cannot be undone.

Loyalsock State Forest is a public trust, meant to be preserved for conservation, recreation, and the well-being of future generations—not industrialized for short-term private profit. Once heavy infrastructure is introduced, the forest cannot be restored to its original condition. The noise, pollution, and sensory disruption from fracking would permanently diminish one of the forest's most valued natural sites.

I urge you to reject any permits, leases, or approvals that would allow fracking or related infrastructure within Loyalsock State Forest, especially near Jacoby Falls. Protecting this area is essential to maintaining clean water, wildlife habitat, and the natural experiences that Pennsylvanians expect from their public lands.

Comment 18: Christina Miller

I am also writing to formally express my strong opposition to any fracking or disruption within the Loyalsock State Forest,

but especially the proposed activities located approximately 600 feet from Jacoby Falls.

Jacoby Falls is a treasured natural feature within the forest, valued for its scenic beauty, ecological importance, and the quiet, immersive experience it offers visitors. Allowing fracking operations so close to this area would fundamentally alter and degrade that experience. Fracking well pads and associated infrastructure are loud, industrial operations that generate constant noise, truck traffic, and persistent odors from emissions and leaks. These impacts are incompatible with a protected forest environment and would effectively destroy the peaceful, natural character of Jacoby Falls.

Beyond the loss of recreational and aesthetic value, the proximity of fracking to Jacoby Falls raises serious environmental concerns. The area relies on clean water and intact forest ecosystems. Industrial drilling so close to a waterfall and its surrounding watershed increases the risk of water contamination, erosion, habitat fragmentation, and long-term ecological damage that cannot be undone.

Loyalsock State Forest is a public trust, meant to be preserved for conservation, recreation, and the well-being of future generations—not industrialized for short-term private profit. Once heavy infrastructure is introduced, the forest cannot be restored to its original condition. The noise, pollution, and sensory disruption from fracking would permanently diminish one of the forest’s most valued natural sites.

I urge you to reject any permits, leases, or approvals that would allow fracking or related infrastructure within Loyalsock State Forest, especially near Jacoby Falls. Protecting this area is essential to maintaining clean water, wildlife habitat, and the natural experiences that Pennsylvanians expect from their public lands.

Comment 19: Mary Ann Stanton

Good Afternoon. Thank you for giving me time to speak about a place that is very dear to me. My name is Mary Ann Sigler Stanton.

[REDACTED] ...but the many wonderful adventures we had as a family and with friends often centered on that trail and at those falls are deeply embedded in my memories and are more than likely a huge part of why I am such an avid hiker and forest enthusiast as an adult. We walked that trail as a family, with friends, with our girl and boy scout troupes - I even had a birthday hike for what I think was my 12th birthday, where a group of fifteen or so girls hiked with my dad to the falls and camped there overnight. My friend Maria actually fell and broke her arm, making an even more memorable birthday more so when we had to bring her out on my horse, meeting the ambulance at my driveway as we exited the trail.

[REDACTED] the beauty and unspoiled nature of that space is as beautiful as it ever was. Deer and wild turkey still gather by the tens on the front yard and across the road in the fields. Fish are still bountiful in Wallis Run and in the other streams and creeks that feed into or out of the area. Industrial development - building an access road and pads would irrevocably and seriously damage that, not to mention the destruction it would cause to the series of streams that criss-cross the trail to the falls.

For ten years my family lived on that property.

[REDACTED] e co-existed with hunters (my brother was an avid hunter), wearing blaze orange when we walked during hunting season - even my horse had an orange blanket! An annual rattlesnake rodeo was held on our property for years - much to my horror there are multiple snake habitats on the space slated for development. We had special sneakers we wore when hiking that trail - as much because my mother grew tired of scolding us for muddy and wet shoes that traversed streams and muddy trails as for the practicality of it all. The peace that you feel on that trail and especially at the falls verges on spiritual. The endless habitat for so much wildlife (yes, even the snakes!) is so fully developed from decades - no, centuries of uninterrupted peace and

tranquility that any interruption, especially one this dramatic and irreversible - would change the character of the area forever.

I have seen firsthand the devastation that natural gas drilling can do to an area. Both in their active and dormant states. We all know that the drilling itself is only part of the story. The access roads, the water retention facilities, the increased traffic to and from the sites, not to mention the drilling pads themselves are an anathema to all that area represents. Pristine streams will be destroyed, their natural paths diverted and polluted by the constant traffic. Fish and other stream inhabitants will die, and land bound wildlife will be re-routed from their familiar living, feeding and hunting grounds. State game land bounty will be impacted, and hunters and fisherfolks will have to go elsewhere. And when the land has been sucked dry? All the development will just continue to exist, the damage done, never to be undone. I have seen “restored” development areas that will never be the same. Aren’t we tired of having our resources, Rural Pennsylvania’s resources, stripped bare by corporations that do not care about us or the beauty and bounty of our region?

In the course of my time as a community member in areas where natural drilling encroached on our spaces, I had the opportunity to meet and chat with many natural gas development folks - from landmen to drillers to pad and road builders. While the landmen always put their best company foot forward (no offense intended) it was the workers who were almost always frank, telling me that the drilling would destroy what we knew of our area. That if we could stop it, we should. I took it to heart then and I take it to heart now when I ask you to please deny these permits. Fossil fuels are a short term solution. They are finite. I beg these companies to spend the funds in their deep corporate pockets on clean energy that has no end date, no time when it will have used up all the wind or rain or sun in creating a power source that we can all share. Jacoby Falls is precious not just to me and so many who have enjoyed it over generations, but to the area ecosystem itself. I urge you to deny PGE’s application.

Comment 20: Barbara Jarmoska

Gas companies do not choose the names of their projects and well pads randomly. Instead, names are frequently an affective branding tactic, creating an emotional softening far from the reality of noise, lights, and environmental destruction. For example, well pads in close proximity to this proposed project include *TLC* and *Little Fawn*. PGE’s “Saluda Project” is no exception. This gentle and almost lyrical word is Spanish for “greeting”. When we raise a glass and say, “Salud!” we’re toasting health and well-being. In sharp contrast to its name, if Saluda is permitted, this project will bring decades-long destruction and degradation to a treasured and unique mountaintop ecology. The only “healthy” outcome will be corporate profits. The beauty and exceptional woodlands and wetlands of Jacoby and Cove mountains in the Loyalsock State Forest will be degraded both now and for the “generations yet to come” referred to in Article 1/Section 27 of the PA Constitution.

Laws and regulations are always an enormous inconvenience to corporations wishing to profit from use of public land. Yet, with enough money and determination, those corporations are historically able to find a way to navigate the regulatory maze that leads to the profits they seek.

Meanwhile, residents read the laws and regulations and continue to wonder how government agencies charged with protecting the health and welfare of its citizens can so blatantly ignore their own mission and rules, endlessly placing the priority on corporate strategies over that of citizens.

Pennsylvania General Energy’s 1,268-page application tells the story of how the extensive degradation of land owned by the Common Wealth will take place. The word “minimize” appears as some kind of promised assurance that degradation won’t be significant, for even the fossil gas driller cannot claim that the industrialization of two mountaintops will not degrade the environment.

And what of that environment? I speak from lived experience. I’ve known this mountain in some capacity for all of my 77 years. As a baby, I was carried in these woods by my grandfather, Dr. P.H. Decker, who rented a cabin on his land along the Loyalsock Creek to Billy Chapman, whose surname appears in the Saluda permit application. I

have mountain biked, x-country skied, horseback ridden, and most of all – hiked, both alone and with family and friends of all ages, on the Dad-Dad Chapman trail. I've traversed Jacoby Mountain from the top of Butternut Grove Road to Bar Bottom, down the sloped trails on one side to the Loyalsock Creek, and on the other to Jacoby Falls. I've experienced these woods in every season, and more times than I can count.

In spring, I've sat in awe beside Jacoby Mountain's vernal pools teeming with amphibian eggs. I've come to an abrupt halt at the sight of a rattlesnake sunning itself on Dad-Dad Chapman trail. Even in the driest months of a parched summer, I've witnessed gravity springs adding clear water to the prolific mountain wetlands of the forest's unique ecology. I've watched in wonder as the ephemerals come to life each spring – Dutchman's Breeches, Spring Beauties, Bloodroot, Violets, Star Chickweed, Trout Lillies, and more - those almost magical woodland wildflowers that emerge, bloom, and disappear within a brief window of early spring as they take advantage of sunlight before the trees leaf out. The changing colors of the springtime forest canopy are more subtle than the bright leaves of autumn, but equally awe-inspiring as the hardwoods begin with the reddish hues of infant leaves before bursting into a thousand shades of green.

This year, PGE is seeking to bring a radically different springtime arrival on the mountain – one where enormous earth-moving equipment will wreak havoc with the fragile, balanced, very wet, and altogether unique and precious ecology of this part of the Loyalsock State Forest.

PGE's claim that the company will minimize degradation while cutting through core forest to build a 3.9-mile access road and 6 well pads, drilling 90 wells, crossing 8 native trout streams, and clear-cutting a 50' pipeline right of way, a portion of which is just 600 feet from the much-loved Jacoby Falls – is a claim that is utterly insane. Why? Because IT IS NOT POSSIBLE. LET'S BE REAL: DEGRADATION WILL BE MASSIVE.

Under DEP's regulations, which are the focus of this hearing, 25 Pa. Code section 105.18a, subsection (c), states that DEP cannot issue a permit for a project that “has a significant adverse impact on a wetland” unless the “project is necessary to abate a substantial threat to public health or safety.”

PGE's permit application demonstrates that its proposed Saluda Project will have a significant adverse impact on unique exceptional value wetlands that are part of a constitutionally protected forest that DEP and DCNR must conserve and maintain as trustees.

In addition to Chapter 105 regs, neither DEP nor DCNR can authorize the loss of these public natural resources under Article I, Section 27 of the Pennsylvania Constitution.

The Chapter 105 permit review process does not in any way circumvent DEP's legal and constitutional requirement to conserve and maintain these unique exceptional forest and wetland resources, as well as DEP's duty to preserve the natural, scenic, historic and aesthetic values of these public natural resources.

By decision of the Pennsylvania Supreme Court in 161 A.3d 911, 916 – the Pennsylvania Environmental Defense Foundation v. the Commonwealth in 2017, “*The Commonwealth must manage our state parks and forest according to the plain language of Section 27, which imposes fiduciary duties consistent with Pennsylvania trust law.*”

PGE's permit application shows that the proposed project area is a core forest public natural resource with exceptional value waters and wetlands throughout. Nothing in this permit application supports a finding that the Saluda Project is necessary to abate a substantial threat to public health and safety. To the contrary, the proposed project creates a substantial threat to the health and safety of anyone seeking to enjoy these public natural resources.

PGE's permit application also paints a picture of compliance with regulations and a corporate brand of respect for the environment. When it comes to water protection, PGE's track record of such compliance is quite the opposite. During construction of the Shawnee Water Withdrawal in the E.V. Loyalsock Creek that will provide the multi-

millions of gallons of fresh water needed to frack Saluda's proposed 90 wells, PGE racked up no less than 12 SEPARATE VIOLATIONS OF THE CLEAN STREAMS ACT. In addition, the underground water pipeline and equipment that PGE installed in the creek was a blatant violation of the permit, significantly larger than allowed. The solution was to ask forgiveness for this violation via the granting of a new permit that approved what PGE actually did vs. what the company originally requested and was permitted to do.

In addition, the Saluda Project application falsely notes that the Jacoby Falls trail is the only public trail within the scope of the project. This is simply not true. Dad-Dad Chapman is a popular public recreation trail used by hunters, bird watchers, scout troops, mountain bikers, cross country skiers and a plethora of hiking enthusiasts wishing to access to Jacoby Falls from the top down instead of using the bottom-up DCNR trail off Wallis Run Road. In spite of this, according to the application, PGE's proposed Pad B will be located smack dab in the middle of Dad-Dad Chapman, thereby gating off the trail and blocking public access to the forest and top portion of the famed waterfall.

PGE's entire analysis assumes that the company is entitled to degrade, diminish and/or deplete the unique exceptional forest and wetland public natural resources impacted by its proposed project because DCNR leased the land on which these constitutionally protected trust assets are located. PGE's claim to the subsurface fossil gas is valid. Their access to this Marcellus methane via degradation of public lands on the forested surface is not.

Currently existing and ever-expanding technology could allow PGE to gain subsurface access from leased properties surrounding these treasured acres of the Loyalsock State Forest. By using advanced drilling technology to access the fossil gas via long laterals drilled from the company's existing infrastructure on COP 726, the exceptional surface acreage of the proposed Saluda Project could be spared from destruction.

This non surface disturbance has numerous precedents, including the nearby 600 acres of Rider Park and the Clarence Moore lands to the north. EQT has already demonstrated the ability to run laterals for miles. The technology exists, and PGE can apply that technology here, and/or access the subsurface via private leaseholds. If PGE claims no access other than Saluda Project approval is possible, the company must forego extraction and seek to recover its losses from the State. Denial of the permit would not improve PGE's profit margins, but would be a great gift to the citizen owners of these Commonwealth lands, and indeed to the nation and world writ large, as no discussion of the continued extraction of fossil gas is complete without an acknowledgement of the greatest existential threat humanity faces. This threat is not hiding in a military bunker or a terrorist cell; it's in plain sight and currently manifesting in the prolonged, frigid temperatures we are experiencing. Our planet's only life support systems are collapsing at an ever-accelerating rate.

Climate collapse reveals democracy's most fundamental challenge: can we save our planet for our children and grandchildren when fossil fuel profits demand inaction? Permafrost is thawing, ice sheets are destabilizing, floods and fires are ever-increasing, and ocean currents are weakening. These aren't distant threats: they're happening now, accelerated by policies designed to benefit corporate profits and donor class investors while sacrificing everyone else.

The great tragedy is, it need not be this way. Speaking in April, 2024, Ban Ki-moon, former UN Secretary-General, not only reminded his audience that "Climate change is the single greatest threat to a sustainable future," he simultaneously proclaimed this powerful truth, "Addressing the climate challenge presents a golden opportunity to promote prosperity, security and a brighter future for all." Tackling climate change is not a zero-sum game; it's a win for BOTH our economy and our environment.

Time is running out, and the climate doesn't negotiate. Surely, future generations will judge us not by our divisive politics, tweets and culture wars, but by whether we protected their right to a livable planet. There are abundant reasons to deny this permit application. DEP cannot legally breach the agency's own Chapter 105 regulations in an EV watershed, nor can the agency ignore its trustee duties under Article I, Section 27 of the

Pennsylvania Constitution. Permitting and facilitating PGE's permit and thereby bringing significant and illegal degradation to the Loyalsock State Forest via the Saluda Project must not go forward.

Comment 21: Ann House

Please deny this application under DEP chapter 105.

The reasons to approve this application are only money and greed. The reasons to deny this application are endless.

PGE already has a reputation for violations of the clean streams act. Additionally, gas companies have a reputation for underreporting the environmental risks and over-emphasizing the financial gain to the community. As if we can put a price on our pristine natural areas as they can not be restored after this type of project. The damage is deep and long-term.

Approval of this permit would be extremely deleterious including the following points:

Destruction and/or disturbance of the three bogs that are less than one thousand feet from the proposed road Traffic, noise, clear cutting and destruction of the forest to make way for the gas pads, roads and equipment storage. PGE states that they will replant, minimize destruction and restore the area. However, native plants and species would take at least 100 years to regrow, and it is very difficult with the presence of invasive species to restore the disturbed areas that are not permanently used by the gas company to healthy forest.

Fragmentation of these woods also will destroy habitat for native trout, birds and snakes to name a few of the endangered and highly valued species that inhabit the Jacoby Falls area.

There are exceptional value waters that would be highly disturbed. And these are extremely valuable and protected by our state constitution.

This is a very fragile ecosystem particularly with the wetlands, vernal pools and slope of the areas to be disturbed. The natural beauty of that part of the Loyalsock State Forest would be destroyed and many plant and animal species adversely affected.

I beg you to stand up for nature and for the citizens that love and enjoy this beautiful part of our state forest system.

Comment 22: Chef Hosch House

I requesting that you deny this application under DEP chapter 105 and/or any other means.

PGE already has a reputation for violations of the clean streams act. Additionally, gas companies have a reputation for underreporting the environmental risks and over-emphasizing the financial gain to the community. As if we can put a price on our pristine natural areas as they can not be restored after this type of project. The damage is deep and long-term.

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There are exceptional value waters that would be highly disturbed. And these are extremely valuable and protected by our state constitution.

This is a very fragile ecosystem particularly with the wetlands, vernal pools and slope of the areas to be disturbed. The natural beauty of that part of the Loyalsock State Forest would be destroyed and many plant and animal species adversely affected.

I beg you to stand up for nature and for the citizens that love and enjoy this beautiful part of our state forest system.

Comment 23: Bailey Gavitt

I am contacting you regarding the Saluda access road, well pads, and staging area in the Loyalsock State Forest. The area where the proposed road will be constructed is a fragile and unique environment containing exceptional value (EV) streams and wetlands.

Bar Bottom Hollow is classified by PA Fish and Boat as a class A Brook Trout Stream. A large staging area that will be transitioned to a gas well pad is proposed to be built uphill of Bar Bottom Hollow. This threatens the EV stream with air and water pollution, sediment, and increased runoff from deforestation and development. The proposed road will cross 8 wetlands, requiring permanent infrastructure to be built over top of them. All of these impacts would degrade the current EV waters located in the state forest.

The DCNR and DEP are required by 25 Pa. Code section 105.18a, and the PA Constitution under Article I, Section 27 to act as a Trustee to protect and preserve the important and irreplaceable EV streams and wetlands resources of its State Forest Lands from degradation, and therefore I believe the subject permit application should be rejected.

Please consider siting drilling pads and associated infrastructure on adjacent private lands, not State Forest Lands, in order to access the subject gas lease area without any surface disturbance to State Forest Lands or EV waters.

Comment 24: Gail Kulp

My name is Gail Kulp, and I am writing to voice my opposition to the PGE Saluda Access Road and Staging Area permit. I am emailing this statement as well as sending it by the mail.

I have lived in [REDACTED] for 17 years and I'm an avid hiker. One of my first hikes here was to Jacoby Falls. I've hiked here in the heat of the summer when the falls could cool me off and I've also hiked here in the middle of the winter when the waterfall is frozen, but I've hiked the Jacoby Falls Trail throughout all seasons of the year. I know many people who have driven here from hours away just to hike the trail or go fishing.

Before writing my comments, I spent time reading about the proposed project. Unfortunately, it brought up even more concerns. The 3.9 mile road and gas drilling pad would come within feet of the waterfall as well as numerous vernal pools. In addition, the road will cross over and completely cover the hiking trail back to the waterfall.

The maps of the proposed road included multiple sites for installation of a French Mattress. Having never seen this term before, I found a Penn State Technical Bulletin from 2022 that said that this is a structure that allows a road to be constructed over a wetland so that water can continue to flow unrestricted.

However, the bulletin mentioned that storms can cause permanent sediment clogs that would prevent water from flowing. And, this means that the streams and culverts would essentially have a dam that would cut off water supply as soon as a large thunderstorm or other weather event were to take place.

The environmental impacts are staggering. Not only will the road cross over the two streams, dozens of culvert crossings are listed along the roadbed, and trees will be cleared for the construction, too. Healthy trout streams would no longer be able to support life once the water supply is cut off and species that rely on the vernal pools will die out. There are also several rattlesnake dens located close to the proposed road, and these snakes will be unable to flourish and hunt with gravel and asphalt in the middle of their path.

This is to say nothing about fracking fluids that would be pumped into the ground to extract the natural gas or the spills that will take place – not if, but when they take place. Fracking fluids are proprietary and the chemical make-up has not been divulged, but it will be pumped into the ground and will negatively impact the flora and fauna of the area as well as the drinking water.

The proposed PGE Saluda Access Road and Staging Area project should not be considered or allowed to take place. Not only will it be detrimental to the environment, it will also stifle tourism and outdoor recreation opportunities.

Comment 25: Morgan Gavitt

My name is Morgan Gavitt and I am [REDACTED]
More importantly, [REDACTED]
[REDACTED] as visitors from around the state and country frequent the plethora of hiking trails and class A Brook Trout streams in the "Sock" year round. After hearing news about the Saluda Access Road Project my first thought was the irreparable damage that will be done to a place that is so special to the community and myself. The Environmental impacts of the stream crossings, wetland crossings, and well pads would be detrimental to the forest and streams. The DCNR and DEP are required by 25 PA Code section 105.18a and the PA constitution under article I, section 27 to act as a trustee to protect and preserve the important and irreplaceable EV streams and wetlands resources of its State Forest lands from degradation. I absolutely do not think DEP should provide the permitting for the gas company to carry on with this project.

Comment 26: Ryan Bahr

I am contacting you regarding the Saluda access road, well pads, and staging area in the Loyalsock State Forest. The area where the proposed road will be constructed is a fragile and unique environment containing exceptional value (EV) streams and wetlands.

Bar Bottom Hollow is classified by PA Fish and Boat as a class A Brook Trout Stream. A large staging area that will be transitioned to a gas well pad is proposed to be built uphill of Bar Bottom Hollow. This threatens the EV stream with air and water pollution, sediment, and increased runoff from deforestation and development. The proposed road will cross 8 wetlands, requiring permanent infrastructure to be built over top of them. All of these impacts would degrade the current EV waters located in the state forest.

The DCNR and DEP are required by 25 Pa. Code section 105.18a, and the PA Constitution under Article I, Section 27 to act as a Trustee to protect and preserve the important and irreplaceable EV streams and wetlands resources of its State Forest Lands from degradation, and therefore I believe the subject permit application should be rejected.

Please consider siting drilling pads and associated infrastructure on adjacent private lands, not State Forest Lands, in order to access the subject gas lease area without any surface disturbance to State Forest Lands or EV waters.

Comment 27: Soran Ashman

I am writing to you in response to the recent news of the Saluda Access Road and Staging Area permit application. I object to this permit application as a resident of Pennsylvania who cares about our ecosystem and natural habitats. Building on this wetland would displace the natural inhabitants and destroy this environment. I implore you not to follow through with this permit application.

Comment 28: Abby H.

I am contacting you regarding the Saluda access road, well pads, and staging area in the Loyalsock State Forest. The area where the proposed road will be constructed is a fragile and unique environment containing exceptional value (EV) streams and wetlands.

Bar Bottom Hollow is classified by PA Fish and Boat as a class A Brook Trout Stream. A large staging area that will be transitioned to a gas well pad is proposed to be built uphill of Bar Bottom Hollow. This threatens the EV stream with air and water pollution, sediment, and increased runoff from deforestation and development. The proposed road will cross 8 wetlands, requiring permanent infrastructure to be built over top of them. All of these impacts would degrade the current EV waters located in the state forest.

The DCNR and DEP are required by 25 Pa. Code section 105.18a, and the PA Constitution under Article I, Section 27 to act as a Trustee to protect and preserve the important and irreplaceable EV streams and wetlands resources of its State Forest Lands from degradation, and therefore I believe the subject permit application should be rejected.

Please consider siting drilling pads and associated infrastructure on adjacent private lands, not State Forest Lands, in order to access the subject gas lease area without any surface disturbance to State Forest Lands or EV waters.

Comment 29: Valerie Ammar-Khodja

I am contacting you regarding the Saluda access road, well pads, and staging area in the Loyalsock State Forest. The area where the proposed road will be constructed is a fragile and unique environment containing exceptional value (EV) streams and wetlands.

Bar Bottom Hollow is classified by PA Fish and Boat as a class A Brook Trout Stream. A large staging area that will be transitioned to a gas well pad is proposed to be built uphill of Bar Bottom Hollow. This threatens the EV stream with air and water pollution, sediment, and increased runoff from deforestation and development. The proposed road will cross 8 wetlands, requiring permanent infrastructure to be built over top of them. All of these impacts would degrade the current EV waters located in the state forest.

The DCNR and DEP are required by 25 Pa. Code section 105.18a, and the PA Constitution under Article I, Section 27 to act as a Trustee to protect and preserve the important and irreplaceable EV streams and wetlands resources of its State Forest Lands from degradation, and therefore I believe the subject permit application should be rejected.

Please consider siting drilling pads and associated infrastructure on adjacent private lands, not State Forest Lands, in order to access the subject gas lease area without any surface disturbance to State Forest Lands or EV waters.

Comment 30: Bruce Buckle

Good evening. My name is Bruce Buckle, [REDACTED] am testifying as President of the Board of Directors of the Lycoming Audubon Society on behalf of our membership of approximately 350 individuals. Lycoming Audubon is a local Chapter of the National Audubon Society serving Lycoming and Clinton counties.

“Birds Unite Us. Enjoyment of birds and the natural world drives Lycoming Audubon’s education and conservation work, centered in communities.” That’s our mission. We work to conserve and restore ecosystems and use our voice to advocate for policies that help birds.

Lycoming Audubon believes that our State Forests are a vital asset that deserve the highest level of protection. Extensive drilling for natural gas and the development of related infrastructure degrades our state forest lands, and poses a significant threat to the birds and other wildlife that depend upon forested habitat.

Fragmentation of contiguous forest lands, as well as noise from construction and drilling and hauling operations, threatens birds and other wildlife, and reduces the recreational value of forest lands. Eastern forest birds are already in steep decline. According to the 2025 State of the Birds Report forest species have lost 27% of their population over the past 50 years. The Western Pennsylvania Conservancy website notes that forest interior birds, including warblers, thrushes, vireos, flycatchers, and tanagers, depend upon large, contiguous tracts of forest to maintain healthy populations. Nearly a quarter of the 90 Species of Greatest Conservation Need (SGCN) listed in the 2015 Pennsylvania Wildlife Action Plan are forest interior birds.

The Wood Thrush is an iconic forest song bird impacted by projects like the proposed road construction and related pad development. According to the 2025 State of the Birds report the Wood Thrush has lost more than 50% of its population in the past 50 years. The Cornell Lab of Ornithology notes that habitat fragmentation results in lower quality food choices and exposes Wood Thrush nests to predators, including parasitic breeders like the Brown-headed Cowbird. A birder friend describes the flute-like song of the Wood Thrush as “God’s music.” In 1931 renowned local educator and naturalist Charles Lose, camping on the Loyalsock, wrote, the “song [of the Wood Thrush] feels ancient and solemn, carrying a sense of permanence even as the natural world around it shows signs of loss and change.” Today, no one can make that claim of permanence.

In June 2024 expert birders David and Bobby Brown walked Dad-Dad Chapman Road, identifying 49 species of birds, including five Wood Thrush. They heard or saw ten different species of wood warblers, as well as Blue-headed and Red-eyed Vireos. Their eBird list also included one Ruffed Grouse, a species in precipitous decline, and five Scarlet Tanagers, another iconic Pennsylvania forest bird impacted by forest fragmentation. Will future birders be as blessed to find such diversity in Penn’s Woods?

Industrial shale gas development is incompatible with the conservation mandate to protect state forest lands for birds and other wildlife. This particular proposal, for the reasons given above, and for its proximity to the popular Jacoby Falls Trail and the apparent closure of other points of access to state forest land like Dad-Dad Chapman Road, represents another step in the wrong direction for a state that professes to promote its natural beauty and conservation ethic as reasons to visit and live in Pennsylvania. For these reasons the Lycoming Audubon Society urges the Department of Environmental Protection to deny PA General Energy’s permit application for the 3.9 mile access road and shale gas staging area in Gamble and Cascade Townships.

Comment 31: Cynthia Bower

My name is Cynthia Bower. I [REDACTED]

Since 1973, I have recreated in the State Forest area of the Saluda Project (Saluda). I consider the land area of Saluda, with its core forest, spectacular waterfall, roadless areas and Exceptional Value waters to be a jewel of Lycoming County.

I have guided adults and children on educational outings to Jacoby Falls and delighted in their joys as they dashed under the curtain of water and explored the rock overhangs. This was "wilderness," a haven in the nature-deprived and screen-addicted culture to which we have become indifferent.

On my 150-acre property, I have a non-surface-disturbance gas lease. I am not opposed to infrastructure and activities that are developed in ways that do not harm the public's natural resources as guaranteed by Article I Section 27 of the State Constitution, the Environmental Rights Amendment (ERA).

In reviewing PGE's application, the ERA, Chapter 93, and 25 Pa. Code section 105.18a as statutory law under the ERA, DCNR and DEP are mandated to uphold their trustee duties to "conserve and maintain" the public natural resources of our State lands per a 2017 Pennsylvania Supreme Court Opinion. I do not believe Saluda meets these mandates.

Impacts to the ecology of the core forest as a whole and the exceptional values of the natural streams must be studied holistically before any declaration of potential non-degradation.

Optimum siting must be that which is in accord with the ERA, not PGE.

The degradation that has taken place due to PGE's gas development on the Allegheny Ridge to the south and east of Saluda is jaw-dropping and beyond comprehension. I have driven the gray slop road out this ridge all the way to the pad at the western end to witness the unconscionable destruction of core forest and headwaters lands. The Loyalsock Trail, built and maintained by volunteers and traveled for years by me and thousands of others has been forever changed. As a public trust beneficiary, I am harmed and horrified at the blatant desecration of what was extensive and integral State Forest, now no longer "forest" but an industrial, fragmented landscape punctuated by a patchwork of trees. How is PGE permitted to destroy the natural forest values to which I am entitled to enjoy? On the Allegheny Ridge and in other State Forests, DCNR and DEP have failed to protect my rights and those of all beneficiaries under the ERA.

Concerns outlined above are brought to center stage on the Allegheny Ridge. This travesty must not happen with Saluda. Enough is enough, and even, already, too much. Saluda as proposed must be denied. It remains to be seen whether our constitutionally-bound Commonwealth trustees have the will, strength of mind, and courage to do so.

Comment 32: Brian Wagner (Trout Unlimited)

The Pennsylvania Council of Trout Unlimited with its 12,000 members is a conservation organization committed to the protection and preservation of our exceptionally valuable cold water natural resources and their supporting wetlands. We welcome this opportunity to testify at this hearing.

PATU supports natural gas extraction infrastructure and activities which are important to the Commonwealth but believes that these activities need to be developed in appropriate places and ways that do not harm and degrade those important and irreplaceable cold water natural resources.

We believe there are significant unacceptable risks and cumulative effects of a large number of permanent impacts and disturbed areas which will degrade important and irreplaceable EV streams and wetlands in the subject DCNR State Forest Land lease tract inherent in PGE's proposed project as presented.

The DCNR and DEP are required by Chapter 93 and 25 Pa. Code section 105.18a, and the PA Constitution under Article 1, Section 27 to act as a Trustee to protect and preserve EV streams and wetlands of the Commonwealth from degradation, and therefore the permit application as presented should be denied.

Our concerns, based on a review of the permit application, DEP Deficiency Letter of 11/20/2025, PGE responses, and revised Environmental Assessment Report, are as follows:

- The subject PGE permit application and supporting documents enumerate dozens of references to forest resources including aquatic resources in exceptional value (EV) streams and wetlands which will be

permanently impacted, and that the proposed alternatives chosen, and proposed construction methods and BMPs to be used will only minimize but not eliminate impacts and degradation of those resources. No quantitative or qualitative data or explanations of “minimization to the extent practicable or possible” are presented which support those practices as equivalent to elimination or prevention of degradation. PADEP guidance policies, not regulations, may indicate that use of Antidegradation Best Available Combination of Technologies (ABACTs) may be used to prevent degrading discharges, but if the use of an ABACT does not produce a nondegrading discharge, it would not be approved. ABACTs, therefore, cannot be assumed to satisfy all the requirements for non-degradation if there are or may be degrading discharges to EV streams.

- No alternatives are presented which consider siting drilling pads and associated infrastructure on adjacent private lands, not DCNR State Forest Lands (SFLs), in order to access the subject gas lease area. Such an approach has been used by EQT to access gas leases in the nearby “Clarence Moore” tracts on Burnetts Ridge and Pleasant Stream areas without surface disturbance to SFLs. Alternative analyses are not presented which evaluate feasibility of alternate pad locations that would eliminate impact to EV streams and wetlands. Why is the apparent starting point for DCNR’s review and comments limited to the pad locations optimal to PGE?
- Discussion of impacts to public access and recreational experiences are limited to the Jacoby Falls Trail and not to impacts to Dad Dad Chapman Road which serves as an important public access to the bulk of the subject SFL impacted by the proposed project. Areas on and along the Dad Dad Chapman Road would be converted into industrial zones by the proposed projects.
- The permit application Attachment 1-2, Compliance Review, has fourteen pages which list over 50 inspections and pollution incidents that the PADEP has conducted or responded to in the past seven years which contain numerous violations by PGE, a number of which have not been resolved. The prospect of carrying out the proposed project by PGE without ensuing violations and pollution incidents which would degrade the subject SFL and its EV aquatic resources is therefore significant and problematic. DCNR and DEP need to reasonably evaluate and consider those risks for this project given the compliance history of PGE and its contractors.
- As required by 25 Pa. Code section 105.18a(6), PGE must affirmatively demonstrate in writing and the DEP must issue a written finding that the cumulative effect of this proposed project and other projects will not impair the Commonwealth’s EV wetland resources. A holistic analysis is needed to determine the cumulative effects of the proposed project’s extensive number of impacts to EV wetlands and streams due to the extensive new disturbed forest footprint, steep, narrow, and impervious proposed new roads, future pipelines, and as many as four or five wellpads which require substantial industrial infrastructure and intensive trucking support along with the accompanying significant risk of pollution events. Absent such a holistic approach, no affirmative finding of non-degradation can be made.
- The application information indicates that the DCNR has worked with and approved the proposed alternative with PGE. The proposed project has documented permanent impacts to EV streams and wetlands with significant risks of pollution incidents and other hydrologic impacts. The extensive roads, pads, and pipelines of the project as proposed will significantly increase impervious areas and subsequently storm water runoff volumes which will impact many EV stream waterways, including Bar Bottom Hollow. How does the DCNR justify its approval of this extensive gas development project on such an exceptional intact and undeveloped important core forest ecosystem when there may be alternative methods now technologically possible to access the gas lease area from outside the subject SFL lease tract and avoid impacts and degradations to EV streams and wetlands?

- As previously stated, the DCNR and DEP are required by 25 Pa. Code section 105.18a, and the PA Constitution under Article I, Section 27 to act as a Trustee to protect and preserve the important and irreplaceable EV streams and wetlands resources of its State Forest Lands from degradation, and therefore we believe the subject permit application should be denied.

Comment 33: Dan Hagan

Good afternoon and thank you for the opportunity to provide comments at today's virtual hearing. My name is Dan Hagan, and I am representing The Marcellus Shale Coalition (MSC) which is a state-wide trade association representing more than 150 energy companies from the upstream, midstream, and downstream sectors, and those who supply goods and professional services to the industry, including our partners in the skilled building trades.

Our members are fully committed to working with local, county, state and federal government officials to facilitate the safe development of natural gas resources in the Marcellus, Utica and related formations.

On behalf of the MSC, I am here to offer our support for the approval of Pennsylvania General Energy's (PGE) joint application to construct a 3.9-mile permanent access road and staging area in Gamble and Cascade Townships in Lycoming County.

Natural gas development is a cornerstone of Pennsylvania's economy with almost \$3 billion in state revenue paid by operators like PGE through the Impact Fee since 2012. Townships and counties alike are the direct beneficiaries of natural gas development.

Lycoming County has seen over \$137 million flow in from natural gas development. In 2024 alone, Lycoming County received over \$2.5 million and Gamble and Cascade Townships received \$155,000 and \$218,000 respectively.

Outside of the direct benefits procured by natural gas development, this industry supports thousands of family sustaining jobs, many in our most rural communities. Pennsylvania households using natural gas have seen statewide annual savings of \$8.83 billion when compared to prices in 2008.

Our operators work diligently to ensure the safe development of natural gas and you can see this meticulous work at hand within this 1,260 page application. PGE and their contractors, in consultation with landowners, the Department of Conservation and Natural Resources, Pennsylvania Game Commission, Pennsylvania Fish and Boat Commission, and U.S. Fish and Wildlife Service, have conducted numerous studies such as water delineations, botanical surveys, mist net surveys, habitat assessments, hibernacula surveys, riverine assessments, among others. It must also be noted that the proposed access road will be an improvement upon an existing state forest road. PGE will be improving the current forest road which includes placing bottomless culverts or culverts six inches below the stream bed to maintain the natural stream gradient where current ford crossings exist.

PGE will also be restoring temporarily impacted wetlands and other natural areas once construction is completed. This includes restoration of topography, soils, and vegetation. Specifically formulated seed mixtures will be used in riparian areas and within wetlands to help reestablish wetland plant communities.

In closing, this application is an example of natural gas development and environmental stewardship coexisting. These two things are not and do not have to be mutually exclusive. We can safely develop natural gas in Pennsylvania while protecting the environment. The opportunities natural gas has brought working families, communities, and the state cannot be understated. For all the reasons stated, we encourage the Pennsylvania Department of Environmental Protection to approve PGE's joint permit application.

Comment 34: Sydney Kilburn

My name is Sydney Kilburn, and I am a Pennsylvania resident who cares deeply about the protection of our state's public lands and waterways. I am writing to submit a public comment in opposition to the Saluda Access Road and Staging Area permit application submitted by Pennsylvania General Energy Co., LLC (PGE).

The proposed project would construct a nearly 4-mile permanent access road and staging area in close proximity to Jacoby Falls and the surrounding Loyalsock State Forest. This area is a unique and irreplaceable natural resource that supports diverse wildlife, native trout streams, and recreational use by the public.

My primary objection to this permit is the significant and long-term environmental harm this project would cause. Construction of a permanent access road in this location will fragment forest habitat, increase erosion and sedimentation, and permanently alter the character of a largely undisturbed area. The project also requires crossing multiple native trout streams, which are particularly sensitive to disturbance and water quality degradation. Even with mitigation measures, road construction and increased industrial activity pose a serious risk to these waterways and the ecosystems that depend on them.

Jacoby Falls and the surrounding forest are valued not only for their ecological importance, but also for their scenic and recreational significance. Allowing industrial infrastructure so close to this area undermines the purpose of protecting public lands and sets a concerning precedent for future development within or near Pennsylvania's state forests.

The environmental costs of this project outweigh potential benefits. I respectfully urge the Department of Environmental Protection to fulfill its duty to protect Pennsylvania's natural resources by denying the Saluda Access Road and Staging Area permit application.

Once this landscape is altered, it cannot be restored to what it is today, and future generations of Pennsylvanians will bear the cost of that decision.

Comment 35: Ann Pinca

In January 2011, I was present at a forum in Laporte, PA, when Dr. Terry Engelder told the audience that the people of Sullivan County needed to sacrifice their land to the natural gas industry for the “betterment” of their country. As a property owner in the county at that time, this did not sit well with me. The beautiful woods and streams of Sullivan County were why we were there. For the next decade, I watched as the natural gas industry dug, drilled, and clearcut its way across the northern tier of Pennsylvania, fragmenting forests, degrading streams, ruining wetlands and even destroying the homes of some residents.

In my downstream home [REDACTED], I watched as pipeline operators constructed two new major pipelines crisscrossing our county that also fragmented forests, degraded streams, and destroyed wetlands. Fish were killed, private wells were damaged, and stream sedimentation abounded. There were numerous violations that clearly revealed the promised “Best Management Practices” so carefully detailed in plans were often blatantly ignored. The PGE application for the Saluda Access Road and Staging Area reveals a staggering amount of impacts for a 3.9 mile access road, including dozens of sensitive stream crossings. PGE currently has over 400 violations per DEP’s compliance report, with over 100 violations in Lycoming County. Based on PGE’s record and the construction I have witnessed personally over the last dozen years, I have little faith that PGE will or even can construct this access road and staging pad without inflicting serious damage on the surrounding streams, forests, and wetlands along with the living flora and fauna within them. For this reason, I am opposed to this project and to the continued development of natural gas production in sensitive forested areas like Jacoby Mountain. Realizing that some natural gas development has already taken place on the mountain, I sadly suspect that this project will eventually go through in some form despite the obvious reasons it should not. If so, I surely hope that PGE is held to the strictest compliance standards possible.

It seems that the people of Pennsylvania as a whole are now sacrificing their public lands, such as the Loyalsock State Forest, for the questionable “betterment” of our country. This sacrifice is made against our will and stands in direct opposition to our environmental rights under our state constitution. As Dr. Engelder said that night in 2011, this industry will leave scars--and it certainly has. Do not allow the wild and lovely area of Jacoby Falls and Mountain to become just one more ugly scar in Pennsylvania. The Pennsylvania Department of Environmental Protection should do what is right for the people per our state constitution and per its own departmental mission, not the will of the natural gas industry. The Saluda Access Road and Staging Area Project must be denied.

Article 1, § 27. Natural resources and the public estate.

The people have a right to clean air, pure water, and to the preservation of the natural, scenic, historic and esthetic values of the environment. Pennsylvania's public natural resources are the common property of all the people, including generations yet to come. As trustee of these resources, the Commonwealth shall conserve and maintain them for the benefit of all the people. (May 18, 1971, P.L.769, J.R.3)

Comment 36: Gabriel Greenway

Your plan to drill 90 wells on 6 well pads, a 4-mile long access road, staging area, and a gas pipeline only 600 ft from Jacoby Falls will cause irreversible damage to not only local wildlife, but pose several health and safety concerns to us, the neighbors of Loyalsock State Forest.

Comment 37: Pat Nardi

I am contacting you regarding the Saluda access road, well pads, and staging area in the Loyalsock State Forest. The area where the proposed road will be constructed is a fragile and unique environment containing exceptional value (EV) streams and wetlands.

Bar Bottom Hollow is classified by PA Fish and Boat as a class A Brook Trout Stream. A large staging area that will be transitioned to a gas well pad is proposed to be built uphill of Bar Bottom Hollow. This threatens the EV stream with air and water pollution, sediment, and increased runoff from deforestation and development. The proposed road will cross 8 wetlands, requiring permanent infrastructure to be built over top of them. All of these impacts would degrade the current EV waters located in the state forest.

The DCNR and DEP are required by 25 Pa. Code section 105.18a, and the PA Constitution under Article I, Section 27 to act as a Trustee to protect and preserve the important and irreplaceable EV streams and wetlands resources of its State Forest Lands from degradation, and therefore I believe the subject permit application should be rejected.

Please consider siting drilling pads and associated infrastructure on adjacent private lands, not State Forest Lands, in order to access the subject gas lease area without any surface disturbance to State Forest Lands or EV waters.

Comment 38: Michael Hill

I am contacting you regarding the Saluda access road, well pads, and staging area in the Loyalsock State Forest. The area where the proposed road will be constructed is a fragile and unique environment containing exceptional value (EV) streams and wetlands.

Bar Bottom Hollow is classified by PA Fish and Boat as a class A Brook Trout Stream. A large staging area that will be transitioned to a gas well pad is proposed to be built uphill of Bar Bottom Hollow. This threatens the EV stream with air and water pollution, sediment, and increased runoff from deforestation and development. The proposed road will cross 8 wetlands, requiring permanent infrastructure to be built over top of them. All of these impacts would degrade the current EV waters located in the state forest.

The DCNR and DEP are required by 25 Pa. Code section 105.18a, and the PA Constitution under Article I, Section 27 to act as a Trustee to protect and preserve the important and irreplaceable EV streams and wetlands resources of its State Forest Lands from degradation, and therefore I believe the subject permit application should be rejected.

Please consider siting drilling pads and associated infrastructure on adjacent private lands, not State Forest Lands, in order to access the subject gas lease area without any surface disturbance to State Forest Lands or EV waters

Comment 39: Dr. Brooke Osborne

I am writing out of strong concern regarding the proposed access road, well pads, and staging area on the Saluda access road in the Loyalsock State Forest. The proposed work and activities would have a lasting, net negative impact on the local ecosystems and public if allowed to proceed in such a valuable and rare system, including exceptional value (EV) streams and wetlands within the catchment.

Bar Bottom Hollow is classified by PA Fish and Boat as a class A Brook Trout Stream. A large staging area that will be transitioned to a gas well pad is proposed to be built uphill of Bar Bottom Hollow. This threatens the EV stream with air and water pollution, sediment, and increased runoff from deforestation and development. The proposed road will cross 8 wetlands, requiring permanent infrastructure to be built over top of them. All of these impacts would degrade the current EV waters located in the state forest.

The DCNR and DEP are required by 25 Pa. Code section 105.18a, and the PA Constitution under Article I, Section 27 to act as a Trustee to protect and preserve the important and irreplaceable EV streams and wetlands resources of its State Forest Lands from degradation, and therefore I believe the subject permit application should be rejected.

Please consider siting drilling pads and associated infrastructure on adjacent private lands, not State Forest Lands, in order to access the subject gas lease area without any surface disturbance to State Forest Lands or EV waters.

In my years of working as an ecologist focused on partnership with land managers and as a 4th-generation native of Lycoming County, it is my opinion that this is a poorly strategized plan and location for such an effort.

Comment 40: Lisa Oser

I am writing to voice my opposition to the PGE Saluda Access Road and Staging Area permit.

I have lived in Pennsylvania for 56 years and I'm an avid hiker and outdoorsman. I have driven to Jacoby Falls from 2 ½ hours away just to hike to the falls for the day.

The road and gas drilling pad would come within feet of the waterfall as well as numerous vernal pools. In addition, the road will cross over and completely cover the hiking trail back to the waterfall.

The environmental impacts to this area of the Loyalsock State Forest would be staggering. Not only will the road cross over the two streams, but the loss of trees that would be cleared for the construction would be devastating. Healthy trout streams will no longer be able to support life when they become polluted from fracking. The flora and fauna of the area will also be negatively impacted as well as the regional drinking water.

The proposed PGE Saluda Access Road and Staging Area project should not be considered or allowed to take place.

Comment 41: Ava Lindsay

I am writing to formally submit a statement in opposition to the proposed project by Pennsylvania General Energy Co., LLC (PGE) for the Saluda Access Road and Staging Area in Cascade and Gamble Townships, Lycoming County.

As a stakeholder in the Lycoming County community, I oppose this project because I am a college student close to—by physical location and emotional connection—Jacoby Falls and therefore, Jacoby Mountain. I know I am not the only undergraduate or non-college person living in Lycoming County that feels this way, and for practical purposes, construction just 600 feet away from Jacoby Falls. This is closer to the habitat than it sounds, especially since the planned access road is under 4 miles long and as many as 90 wells on 6 well pads will be drilled. People need the environment and biodiversity because their degradation harms us all. What are an access road and staging area on the mountain in Loyalsock State Forest even for?

There are many people I know, both outside of Lycoming College and Pennsylvania in general (as I was born in south central PA), that are unable to go out and visit natural state parks and forests, let alone just one. I am a far distance away from Williamsport and Lycoming College is a place I have lived at the second longest in my life. What I mean to say is, before Lycoming, I have not really had the chance to visit any state forest specifically. I bet there are other people in a similar situation as me, or those who were born in Lycoming County that enjoy visiting it without disruptive construction polluting the ecology. Or, for people who have hobbies of visiting state forests and the like in their purest forms, if the Chapter 105 Permit from DEP was acquired, the unique wildlife of Jacoby Falls would never be the same again.

Though Jacoby Falls and Forest together are a “state forest,” they are not protected. They deserve to be because most are not, displacing species of staple fish and birds. The process of building and drilling extra holes just to store tools sounds like too much, even more so when there would be 19 temporary stream crossings and 10 temporary wetland crossings. “Temporary” is a key word here, because what will be done with all of them once the permanent crossings, wells, and access road will be there to stay? Would they just be left there as sterile patches of land that neither humans, plants, nor animals could use in the future? How good is it to assume future well pads could be constructed the same way?

The proposed disturbance is approximately 40 acres, and if you need a visual, that is as large as 380 basketball courts. The damage from this completed proposal would reach out farther, and for what? The United States already has water problems from over-irrigation, deforestation, and Artificial Intelligence Data Centers excessively using it to cool down servers; these are just a few examples among several others. I do not believe it would be wise to proceed in this idea; the cons outweigh the pros for everyone.

Comment 42: Hello

Your plan to drill 90 wells on 6 well pads, a 4-mile long access road, staging area, and a gas pipeline only 600 ft from Jacoby Falls will cause irreversible damage to not only local wildlife, but pose several health and safety concerns to us, the neighbors of Loyalsock State Forest.

Comment 43: ESS

Your plan to drill 90 wells on 6 well pads, a 4-mile long access road, staging area, and a gas pipeline only 600 ft from Jacoby Falls will cause irreversible damage to not only local wildlife, but pose several health and safety concerns to us, the neighbors of Loyalsock State Forest.

Comment 44: Carlee Kneasel

Your plan to drill 90 wells on 6 well pads, a 4-mile long access road, staging area, and a gas pipeline only 600 ft from Jacoby Falls will cause irreversible damage to not only local wildlife, but pose several health and safety concerns to us, the neighbors of Loyalsock State Forest.

As a member of this community, I am dissatisfied with these plans and I strongly urge you drill the wells elsewhere, or at least be more considerate of the nature of the forests and the wildlife.

Comment 45: Tracy Cole

I attended the Teams meeting held about the proposed permit for PGE to drill, pave, and construct in the area of Jacoby Falls. Frankly, I can't understand why it's necessary for the public to speak out on this matter, as I think it should go without saying that public land set aside for public enjoyment should not risk harm from corporate development.

However, here are my thoughts:

1) According to the PA. gov website under Environmental Heritage, Article 1, Section 27 of the PA Constitution was ratified on 5/18/1971. The website states, "Pennsylvania's public natural resources are the common property of all the people, including generations yet to come. As trustee of these resources, the Commonwealth shall conserve and maintain them for the benefit of all the people." Aren't we in direct violation of the constitution if public land in the Loyalsock State Forest is not conserved??

2) The Northcentral PA Conservancy on their website states that in the early 2000's, a private seller offered 362.5 acres of land "to ensure the trail out to the Falls and other recreational areas would remain open to the public...allowing future generations to enjoy ice caves in the winter and waterfall rainbows in the spring.". What happens when land that you donate to be conserved is turned over for development to a public company for profit? It sounds illegal to me, and if it's not, it should be.

3) Purple Lizard Maps, a popular source of information for people all over the country who want to enjoy the outdoors, states that the Loyalsock State Forest "has just about everything that an outdoors lover could want." They make it sound like more than just locals feel like this is a pretty important natural area.

4) During the Teams meeting, there were comments from the current and past Audubon Society local chapter presidents. Their comments included the crucial importance of a "continuous tree canopy" for birds currently thriving in that area. The PGE rep promised re-seeding the area with naturally occurring plants. Even if the wooded portion of this area was replanted with trees, the canopy would be jeopardized, and we could lose several bird species who need that.

5) A Trout Unlimited rep highlighted the delicate nature of trout spawning that takes place in this area, providing the native trout that makes our streams world-class fishing areas. Again, our Commonwealth's responsibility of conserving its public land would be compromised.

6) Barb Jarmoska and others highlighted the beauty of this area, and the restorative properties of nature. We need nature, and that's why public land with very special natural features have been set aside. Finding a vernal pool filled with frog eggs or salamanders is as crucial to our local amphibians as it is to those of us who delight in seeing them away from the stresses of our normal lives. Jacoby Falls is one of the most beautiful waterfalls in the state. This is a very unique area that lift us up. It must be preserved, not given up for development of any kind.

7) Finally, the most mystifying point to me is this. In looking at PA DEP Oil and Gas mapping, one can make the argument that most of Northern and Eastern Lycoming County is covered in natural gas wells that private landowners have on their properties. Anecdotally, I've heard that royalty payments have plummeted, not because there isn't natural gas there, but because the gas companies aren't drawing gas from those wells. How can it be said that drilling on public land is in any way necessary? In fact, it would detract from the profits to private landowners who have given up rights to their own land.

I conclude by stating that denying this permit to PGE is the only moral and legal option.

Comment 46: Thomas McGarry

I am writing to submit public comment regarding the Saluda Access Road and Staging Area Project proposed by Pennsylvania General Energy Co., LLC (PGE) in Cascade and Gamble Townships, Lycoming County.

I am whole heartedly against any further destruction of our beloved state forests. I asked that you not grant any access to Pennsylvania General Energy Co.

Comment 47: Josh Bahr

I am contacting you regarding the Saluda access road, well pads, and staging area in the Loyalsock State Forest.

I am an avid outdoorsman, hiker, trail runner, hunter, and fisherman. I spend much of my time in the Loyalsock State Forest to recreate. I can look out my front door and see the Allegheny Front. I am a member of the Alpine Club and maintain numerous miles of trails within the state forest. I watched first hand the damage and devastation caused by the roads, pipelines, wells, and increased traffic across the Allegheny Front. A once quiet and pristine area has been forever changed. It has changed the way we use the trail system in OUR state forest.

This proposed access road near Jacoby Falls will cut through a fragile and unique environment containing exceptional value (EV) streams and wetlands.

Bar Bottom Hollow is classified by PA Fish and Boat as a class A Brook Trout Stream. A large staging area that will be transitioned to a gas well pad is proposed to be built uphill of Bar Bottom Hollow. This threatens the EV stream with air and water pollution, sediment, and increased runoff from deforestation and development. The proposed road will cross 8 wetlands, requiring permanent infrastructure to be built over top of them. All of these impacts would degrade the current EV waters located in the state forest.

The DCNR and DEP are required by 25 Pa. Code section 105.18a, and the PA Constitution under Article I, Section 27 to act as a Trustee to protect and preserve the important and irreplaceable EV streams and wetlands resources of its State Forest Lands from degradation, and therefore I believe the subject permit application should be rejected.

Please consider siting drilling pads and associated infrastructure on adjacent private lands, not State Forest Lands, in order to access the subject gas lease area without any surface disturbance to State Forest Lands or EV waters

Comment 48: Nate Wilson

I am writing to submit public comment regarding the Saluda Access Road and Staging Area Project proposed by Pennsylvania General Energy Co., LLC (PGE) in Cascade and Gamble Townships, Lycoming County.

I am a recreational user who has spent many hours and days hiking in the Loyalsock and areas around Jacoby falls, with a strong interest in protecting local water resources, public safety, and the character of our region. I am concerned that this project would introduce unnecessary industrial disturbance into a sensitive headwater watershed.

The proposed project affects the Jacoby Falls watershed, which drains to Wallis Run, Loyalsock Creek, the Susquehanna River, and ultimately the Chesapeake Bay. Disturbance at this upstream location increases risks of erosion, sedimentation, and flooding that extend well beyond the immediate project area.

Jacoby Falls is an important natural and recreational resource for the community. This is an area that I spend a lot of time hiking in and around with my wife and extended family throughout the year. It is hard to fathom what an

intrusion by the gas companies into this area would result in. My time in the outdoors around the PA Wilds before and after Fracking made its appearance indicates that it would not be positive.

Its accessibility makes it especially valuable, and industrial development would permanently alter its character.

With increasingly intense rainfall events, new road construction and land disturbance raise serious concerns about stormwater runoff and downstream flooding, including impacts to Wallis Run, Bar Bottom Hollow, and the Loyalsock Creek corridor.

I am also concerned that feasible, lower-impact alternatives, such as horizontal lateral drilling from existing well pads, have not been adequately evaluated. Avoiding new surface disturbance in sensitive headwater areas should be a priority.

For these reasons, I respectfully urge DEP to deny the permit application or require additional environmental review and alternatives analysis before any approval is considered.

Thank you for considering my comments and for your role in protecting Pennsylvania's natural resources.

Comment 49: Zachary Lyons

I am submitting this comment in opposition to the Saluda Access Road and Staging Area Project proposed by Pennsylvania General Energy Co., LLC (PGE) in Cascade and Gamble Townships, Lycoming County.

I am a resident of [REDACTED] with a direct interest in protecting water resources, public safety, and the long-term environmental integrity of our region. Based on the project location and scope, I believe the proposed activity presents unacceptable risks to a sensitive headwater watershed and does not adequately demonstrate that impacts have been avoided or minimized to the maximum extent practicable.

Headwater Watershed and Downstream Impacts

The proposed project is located within the Jacoby Falls headwaters, which drain to Wallis Run, then to Loyalsock Creek, the Susquehanna River, and ultimately the Chesapeake Bay. As a headwater system, this area plays a critical role in maintaining downstream water quality, regulating flow, and supporting ecological stability.

Land disturbance associated with new road construction and staging areas increases the likelihood of erosion, sedimentation, and stormwater runoff. In headwater environments, these impacts are magnified downstream, cumulatively degrading water quality, streambank stability, and habitat well beyond the immediate project footprint.

Given Pennsylvania's obligations under the Clean Streams Law and its commitments related to the Susquehanna River Basin and Chesapeake Bay restoration, new industrial disturbance in intact headwaters warrants the highest level of scrutiny.

Public Trust Resources and Community Value

Jacoby Falls is a locally significant natural feature and one of the few easily accessible waterfalls in Lycoming County. It is regularly used by residents for hiking, photography, quiet recreation, and personal restoration. Its accessibility makes it particularly important for families, older residents, and individuals with limited mobility who may not be able to access more remote public lands.

Under Pennsylvania's public trust doctrine, natural resources such as clean water, scenic landscapes, and ecological systems are held in trust for the benefit of present and future generations. Industrializing this area would permanently diminish both its ecological function and its value as a public resource.

Climate Resilience and Flood Risk

The increasing frequency and intensity of precipitation events associated with climate change amplify the risk of surface disturbance in this watershed. Road construction, soil compaction, and altered drainage patterns increase runoff volume and velocity during storm events, elevating the risk of flooding, sediment transport, and stream channel destabilization.

These impacts extend beyond the project area. Increased runoff and sediment loads in Wallis Run and Bar Bottom Hollow could exacerbate downstream flooding and erosion in the Loyalsock Creek corridor, affecting communities such as Montoursville. Upstream decisions directly affect flood resilience and public safety downstream.

Failure to Adequately Evaluate Lower-Impact Alternatives

Modern unconventional gas development commonly employs long horizontal laterals drilled from existing well pads to access subsurface resources over wide areas, thereby minimizing new surface disturbance. In many cases, laterals extending several miles eliminate the need for new access roads or staging areas in sensitive locations.

PGE operates existing well pads and infrastructure within Lycoming County and the surrounding regions. The application does not sufficiently demonstrate why development via lateral extensions from existing pads is not feasible, nor does it provide an adequate alternatives analysis demonstrating that the proposed project represents the least environmentally damaging practicable alternative.

Cumulative and Long-Term Impacts

New access roads and staging areas create permanent alterations to land cover and hydrology and often facilitate future industrial expansion. Incremental approvals of such infrastructure result in cumulative impacts that are frequently underestimated during individual permit reviews but have lasting consequences for watershed health and community resilience.

Conclusion

For these reasons, I respectfully request that DEP deny the permit application or require a substantially more rigorous environmental review that fully evaluates cumulative impacts, downstream risks, climate resilience, and feasible lower-impact alternatives using existing infrastructure.

Protecting headwaters protects all waters downstream. Once compromised, these systems cannot be fully restored.

Comment 50: Cortny Geise

In I am writing to submit public comment regarding the Saluda Access Road and Staging Area Project proposed by Pennsylvania General Energy Co., LLC (PGE) in Cascade and Gamble Townships, Lycoming County.

I am a community member with a strong interest in protecting local water resources, public safety, and the character of our region. I am concerned that this project would introduce unnecessary industrial disturbance into a sensitive headwater watershed.

The proposed project affects the Jacoby Falls watershed, which drains to Wallis Run, Loyalsock Creek, the Susquehanna River, and ultimately the Chesapeake Bay. Disturbance at this upstream location increases the risk of erosion, sedimentation, and flooding that extends well beyond the immediate project area.

Jacoby Falls is an important natural and recreational resource for the community. It is a beautiful area my family frequently visits. It is often a landmark I suggest to locals and non locals traveling through our area. Its accessibility makes it especially valuable, and industrial development would permanently alter its character.

With increasingly intense rainfall events, new road construction and land disturbance raise serious concerns about stormwater runoff and downstream flooding, including impacts to Wallis Run, Bar Bottom Hollow, and the Loyalsock Creek corridor.

I am also concerned that feasible, lower-impact alternatives, such as horizontal lateral drilling from existing well pads, have not been adequately evaluated. Avoiding new surface disturbance in sensitive headwater areas should be a priority.

For these reasons, I respectfully urge DEP to deny the permit application or require additional environmental review and alternatives analysis before any approval is considered.

Comment 51: Lauren Bahr

I am writing to express my objection to the Saluda access road, well pads, and staging area in the Loyalsock State Forest. I grew up with a view [REDACTED] from my bedroom window. I have spent countless hours in the Loyalsock State Forest hiking, running, and spending quality time with family and friends. I am [REDACTED] so growing up in this region when I did I saw firsthand the impact of the natural gas industry on these ecosystems as the industry exploded and brought light and noise pollution, increased emissions from fleets of heavy machinery, and roads that scarred and fractured important habitats. I have watched and grieved as beloved trails are gouged, forests are

cleared, and the installation of well pads brings chaos to what had always been a calm refuge for me and many others.

As both an avid outdoorsperson and a scientist, I care deeply about ensuring the accessibility and health of our forests for generations to come. Drilling for natural gas is not an innocent or clean way of procuring energy. A publication from researchers at Washington State University reports that flaring, the burning off of natural gas byproducts during extraction, is linked to increases in respiratory health related hospital visits in local communities downwind of these wells- a direct impact on human health. This is not something that has only been observed west of us, multiple studies in Pennsylvania have found significant associations between fracking and severe asthma, increases in lymphoma cases near active gas pads, and poor birth outcomes. I am deeply concerned about the public health implications associated with this project.

Of equal importance there is extreme environmental impact associated with this project. A 4 mile permanent access road with multiple permanent stream and wetland crossings is by definition going to fracture habitats. "Restoration" of these habitats back to their original conditions is impossible. A huge amount of waste is generated during the process of fracking, and even if this waste does not flow directly into our waterways it is taken to landfills where runoff, which can contain heavy metals and radioactive materials, makes its way into local waterways. Researchers in western PA have found elevated levels of radium in freshwater mussels downstream of gas wastewater discharge points. The streams and wetlands in this area are classified as exceptional value (EV) streams, fragile and important ecosystems supporting a diverse host of organisms.

I also am concerned about and object to "lower-impact" alternative methods such as lateral drilling as these methods have not been adequately evaluated. Avoiding disturbance of these EV streams and wetlands should be top priority. What a rare resource we have, and what a waste it would be to destroy it for corporate profit. [REDACTED] [REDACTED] I still spend significant time in the Loyalsock State Forest. I am devastated to think of further destruction of the state forests that we are so lucky to recreate in in the name of profit. I cannot quantify the good these forests have done for me and so many others, they are quite literally a priceless resource. I believe that if we claim to love the woods, the environment, and the region we call home it is our responsibility to protect the health of all beings in and around this land.

For this reason, I strongly oppose the approval of this project.

Comment 52: Beth Jones

My name is Beth Jones, and I run Deep Green Journey, a local non-profit that offers Forest Therapy Walks, Backpack Trips and workshop opportunities for local organizations. Most of our events are held in the Loyalsock State Forest. My understanding is that the Saluda Access Road and Staging area will intersect and overlap with a region that contains some of the most pristine areas in the Loyalsock State Forest, including but not limited to the streams around Jacoby falls, vernal pools and wetlands of the area as well as access to Bar Bottom Hollow, a beautiful and unique valley of waterfalls and rock formations in a narrow canyon that runs into the Loyalsock Valley.

I understand that money is always a big factor in gas development and so I ask the DEP to also consider the money lost as we destroy acres of one of PA best and most lucrative resources as our Outdoor industry that brings in 19 million dollars each year to our state. Participants travel to attend Deep Green Journey events from all over Pennsylvania and many from outside our state including Maryland, Ohio, Delaware, New York, Connecticut and as far away as South Carolina and Texas. These participants don't just spend money for my events. Their trips often include hotel rooms, gas and restaurants before and after my events, bringing funding into our local area.

In addition to our offerings, hunters, fisherman, hikers, backpackers, mountain bikers, birders will all be impacted by this decision to bring destruction on this well known, often visited - beautiful section of the Loyalsock State Forest.

I ask you to compare the 19 billion dollars, or 2% of GDP that the outdoor recreation industry brings to Pennsylvania compared to only 1.3% for fracking revenue.

And yet, again, we are making it possible to give away one of our most precious resources.

I have witnessed the clear cutting of access roads across this valley near Bryan Hay trail and the Alleghany front where the Loyalsock trail crosses numerous times, turning what was a beautiful section of trail into a wasteland of ruts and stumps, uprooted trees and mud.

Not just the streams that this road will cross that are rated exceptional value but the vernal pools located towards the top of the mountain, as well as every wrinkle of these mountains and valleys house a unique habitat for all sorts of organisms, seen and unseen. By cutting a large swath across the forest you are destroying a cycle that has flourished for decades. What's not seen is the disruption of feeding and breeding for countless creatures and often admire the resilience of nature but for how long as we continue to destroy pieces of habitat in the name of profit?

Comment 53: Karen Hogenboom

I am submitting this comment in opposition to the Saluda Access Road and Staging Area Project proposed by Pennsylvania General Energy Co., LLC (PGE) in Cascade and Gamble Townships, Lycoming County.

Comment 54: Kevin Williams

I am writing to submit public comment regarding the Saluda Access Road and Staging Area Project proposed by Pennsylvania General Energy Co., LLC (PGE) in Cascade and Gamble Townships, Lycoming County.

I am a resident and recreational user with a strong interest in protecting local water resources, public safety, and the character of our region. I am concerned that this project would introduce unnecessary industrial disturbance into a sensitive headwater watershed.

The proposed project affects the Jacoby Falls watershed, which drains to Wallis Run, Loyalsock Creek, the Susquehanna River, and ultimately the Chesapeake Bay. Disturbance at this upstream location increases risks of erosion, sedimentation, and flooding that extend well beyond the immediate project area.

Jacoby Falls is an important natural and recreational resource for the community.

The Loyalsock State Forest is a tremendous example of the power of conservation and preserves the natural beauty of Pennsylvania's mountains. The purpose of the forest should remain conservation and allowing a road that would cause environmental damage in order to reach wells that cause a different kind of environmental damage in such a place would be the antithesis of the forests as an idea.

Its accessibility makes it especially valuable, and industrial development would permanently alter its character.

With increasingly intense rainfall events, new road construction and land disturbance raise serious concerns about stormwater runoff and downstream flooding, including impacts to Wallis Run, Bar Bottom Hollow, and the Loyalsock Creek corridor.

I am also concerned that feasible, lower-impact alternatives, such as horizontal lateral drilling from existing well pads, have not been adequately evaluated. Avoiding new surface disturbance in sensitive headwater areas should be a priority.

For these reasons, I respectfully urge DEP to deny the permit application or require additional environmental review and alternatives analysis before any approval is considered.

Comment 55: Matt Reutlinger

My name is Matt Reutlinger and I am writing to urge the Department of Environmental Protection to deny Chapter 105 permit for PGE's development project.

I'm an avid hiker and believe that stewarding PA's natural spaces is essential to a verdant, sustainable, and welcoming commonwealth. PGE, and other fossil fuel development on public lands, is antithetical to that vision. Their (PGE's) plan to develop an access road, pags, staging areas, and a pipeline so close to Jacoby Falls is begging for another incident like those in Freeport and Springhill (Greene County, PA).

Comment 56: Gail Kulp

To whom it may concern;

I am writing to voice my opposition to the PGE Saluda Access Road and Staging Area permit. I am emailing this statement as well as sending it by the mail. have [REDACTED] and I'm an avid hiker. One of my first hikes here was to Jacoby Falls. I've hiked here in the heat of the summer when the falls could cool me off and I've also hiked here in the middle of the winter when the waterfall is frozen, but I've hiked the Jacoby Falls Trail throughout all seasons of the year. I know many people who have driven here from hours away just to hike the trail or go fishing.

Before writing my comments, I spent time reading about the proposed project. Unfortunately, it brought up even more concerns. The 3.9 mile road and gas drilling pad would come within feet of the waterfall as well as numerous vernal pools. In addition, the road will cross over and completely cover the hiking trail back to the waterfall.

The maps of the proposed road included multiple sites for installation of a French Mattress. Having never seen this term before, I found a Penn State Technical Bulletin from 2022 that said that this is a structure that allows a road to be constructed over a wetland so that water can continue to flow unrestricted. However, the bulletin mentioned that storms can cause permanent sediment clogs that would prevent water from flowing. And, this means that the streams and culverts would essentially have a dam that would cut off water supply as soon as a large thunderstorm or other weather event were to take place.

The environmental impacts are staggering. Not only will the road cross over the two streams, dozens of culvert crossings are listed along the roadbed, and trees will be cleared for the construction, too. Healthy trout streams would no longer be able to support life once the water supply is cut off and species that rely on the vernal pools will die out.

There are also several rattlesnake dens located close to the proposed road, and these snakes will be unable to flourish and hunt with gravel and asphalt in the middle of their path.

This is to say nothing about fracking fluids that would be pumped into the ground to extract the natural gas, or the spills that will take place - not if, but when they take place. Fracking fluids are proprietary and the chemical make-up has not been divulged, but it will be pumped into the ground and will negatively impact the flora and fauna of the area as well as the drinking water.

The proposed PGE Saluda Access Road and Staging Area project should not be considered or allowed to take place. Not only will it be detrimental to the environment, it will also stifle tourism and outdoor recreation opportunities.

Comment 57: Jacob Casey

I am writing to submit public comment regarding the Saluda Access Road and Staging Area Project proposed by Pennsylvania General Energy Co., LLC (PGE) in Cascade and Gamble Townships, Lycoming County.

I am a property owner with a strong interest in protecting local water resources, public safety, and the character of our region. I am concerned that this project would introduce unnecessary industrial disturbance into a sensitive headwater watershed.

The proposed project affects the Jacoby Falls watershed, which drains to Wallis Run, Loyalsock Creek, the Susquehanna River, and ultimately the Chesapeake Bay. Disturbance at this upstream location increases risks of erosion, sedimentation, and flooding that extend well beyond the immediate project area.

Jacoby Falls is an important natural and recreational resource for the community. My family and I hiked there over the summer and frequently stopped to admire the beauty of the trail. The falls sneak up on you as you go through, and the joy on my children's faces when they were able to stand behind the falls was magical. Its accessibility makes it especially valuable, and industrial development would permanently alter its character.

With increasingly intense rainfall events, new road construction and land disturbance raise serious concerns about stormwater runoff and downstream flooding, including impacts to Wallis Run, Bar Bottom Hollow, and the Loyalsock Creek corridor.

I am also concerned that feasible, lower-impact alternatives, such as horizontal lateral drilling from existing well pads, have not been adequately evaluated. Avoiding new surface disturbance in sensitive headwater areas should be a priority.

For these reasons, I respectfully urge DEP to deny the permit application or require additional environmental review and alternatives analysis before any approval is considered.

Comment 58: Melissa Lyon

In I am writing to submit public comment regarding the Saluda Access Road and Staging Area Project proposed by Pennsylvania General Energy Co., LLC (PGE) in Cascade and Gamble Townships, Lycoming County.

I am a resident [REDACTED], and avid hiker of the area, with a strong interest in protecting local water resources, public safety, and the character of our region. I am concerned that this project would introduce unnecessary industrial disturbance into a sensitive headwater watershed.

The proposed project affects the Jacoby Falls watershed, which drains to Wallis Run, Loyalsock Creek, the Susquehanna River, and ultimately the Chesapeake Bay. Disturbance at this upstream location increases risks of erosion, sedimentation, and flooding that extend well beyond the immediate project area.

Jacoby Falls is an important natural and recreational resource for the community.

Personally, I like to take friends out on hikes to the Falls, for an easier hike to get people into their natural environment and experience the great outdoors.

Its accessibility makes it especially valuable, and industrial development would permanently alter its character. With increasingly intense rainfall events, new road construction and land disturbance raise serious concerns about stormwater runoff and downstream flooding, including impacts to Wallis Run, Bar Bottom Hollow, and the Loyalsock Creek corridor.

I am also concerned that feasible, lower-impact alternatives, such as horizontal lateral drilling from existing well pads, have not been adequately evaluated. Avoiding new surface disturbance in sensitive headwater areas should be a priority.

For these reasons, I respectfully urge DEP to deny the permit application or require additional environmental review and alternatives analysis before any approval is considered.

Comment 59: Emily Bohlin

I am writing on behalf of the Lycoming Environmental Awareness Foundation (LEAF), a student-led organization at Lycoming College dedicated to local conservation and sustainability. We formally submit this statement in opposition to the proposed project by Pennsylvania General Energy Co., LLC (PGE) for the Saluda Access Road and Staging Area in Cascade and Gamble Townships.

As stakeholders in the Lycoming County community, we believe the proposed 3.9-mile permanent access road and 40-acre limit of disturbance pose significant, irreversible threats to the ecological integrity of the Loyalsock State Forest. The project involves 20 permanent and 19 temporary stream crossings, along with multiple wetland encroachments. This level of disturbance degrades the Loyalsock Creek watershed, risking sedimentation and long-term water quality decline which in turn threatens species like the iconic state amphibian of Pennsylvania and largest salamander in North America, the eastern hellbender.

Students in our organization enjoy recreating in the Loyalsock State Forest and hiking the Jacoby Falls Trail on weekend excursions and with our Outdoor Leadership and Education group (OLE). Our students study the health of streams including the Loyalsock Creek and Wallis Run. They research and seek to protect vulnerable species, like the hellbender, that use these very tributaries. What do we think is going to happen if we keep degrading the watershed? Our common species will become threatened, and our threatened species will become memories.

While presented as an "access road," this infrastructure serves as a precursor to expansive industrial well-pad development. The construction of a permanent industrial road and staging area will bisect critical interior forest habitats. Forest fragmentation disrupts wildlife corridors, reduces carbon sequestration, increases low quality edge habitat, and encourages the spread of invasive species among countless other impacts. We urge the DEP to consider the cumulative environmental burden this project places on public lands, which should be managed for conservation and public recreation rather than industrial exploitation.

The members of LEAF advocate for the protection of our local environment to ensure a sustainable future for Lycoming County. We urge you to prioritize the protection of our local ecosystems by denying the ESCGP-4 and Chapter 105 permits for this project.

Comment 60: Poune Saberi

I am writing in opposition to the permit that will ruin and heartbreakingly degrade the exceptional area that is Jacoby Mountain. I am including the regulatory references below. I will add that as a physician I am extremely concerned about the unmitigated impacts on air pollution which can travel for miles, pollution of our ever declining fresh water supplies many of which are the origins of drinking water, and multiplication of drivers of climate change which will make Pennsylvanians sick by driving extreme weather events. Not to mention the fact that human health is directly tied to the health of nature and natural lands and by allowing unnecessary permits such as this, you are robbing the rest of Pennsylvanians of the natural treasures that remedy their mental health, especially in times of so much social stress.

Under DEP’s regulations, which are the focus of this hearing, 25 Pa. Code section 105.18a, subsection (c), states that DEP cannot issue a permit for a project that “has a significant adverse impact on a wetland” unless the “project is necessary to abate a substantial threat to public health or safety.”

PGE’s permit application demonstrates that its proposed Saluda Project will have a significant adverse impact on unique exceptional value wetlands that are part of a constitutionally protected forest that DEP and DCNR must conserve and maintain as trustees.

In addition to Chapter 105 regs, neither DEP nor DCNR can authorize the loss of these public natural resources under Article I, Section 27 of the Pennsylvania Constitution. The Chapter 105 permit review process does not in any way circumvent DEP’s legal and constitutional requirement to conserve and maintain these unique exceptional forest and wetland resources, as well as DEP’s duty to preserve the natural, scenic, historic and aesthetic values of these public natural resources.

By decision of the Pennsylvania Supreme Court in 161 A.3d 911, 916 – the Pennsylvania Environmental Defense Foundation v. the Commonwealth in 2017, “The Commonwealth must manage our state parks and forest according to the plain language of Section 27, which imposes fiduciary duties consistent with Pennsylvania trust law.”

Deny the permit for PGE's Saluda Project.

Comment 61: Juliana Flower

As someone whose family has been linked with the beautiful Loyalsock Creek for generations, I urge you to save Jacoby Mountain from wetland and stream degradation by PGE's Saluda Project. DENY THE PERMIT!

Comment 62: Julia Kasdorf

I write to ask that you fairly evaluate PGE's Saluda Project in light of public regulations that protect waterways.

Save Jacoby Mountain from wetland and stream degradation.

As a life-long citizen of the Commonwealth, taxpayer and voter, I urge you to deny the permit.

Comment 63: Kevin Eck

I am a resident near the area that will be disturbed by the proposed Saluda Access Road and Staging Area Project by Pennsylvania Energy Co. It is in the interest of the local community to leave this area in its current state. The area has already been disturbed by pipeline drilling, and any additional activity could cause irreversible harm. I've hiked in Lycoming county and the surrounding area for years, and often rely on fresh water in the area for extended trips. I've heard countless stories of drilling operations having accidents or intentionally dumping wastewater. I use a filter for the water, but it does not filter out heavy metals or contaminates, it only filters large particles. I drink it, I let my kids drink it. If additional activity happens in the area, it could contaminate the water permanently without any indication to people and animals that drink it. The short and long term effects of drinking contaminated

wastewater are certainly understood, and they are very harmful to your health. Please consider the residential use of the area and that its worth amongst the local community and wildlife far outweighs the potentially income it could bring in.

Comment 64: John and Leah Tewksbury

I am writing to voice my opposition to granting the permit for PGE's proposed Saluda Project in the Loyalsock State Forest. Since oil and gas drilling and fracking has arrived in PA, our forests and wildlands have been under continuous assault from this industry. Do not allow yet another pristine and public area of our Commonwealth to be destroyed to satisfy the relentless oil and gas industries, which profit off of our lands, water, and air and yet fail to ensure any kind of sustainable recovery from their damaging and polluting practices. Please listen to the residents of this state and those who understand and value of undisturbed, unpolluted forests and greenways. Deny this permit!

Comment 65: Judy Steinhilper

I am writing to strongly oppose the permit for PGE's Saluda Project in the Loyalsock Forest near Jacoby Falls.

We must stop this incursion into and destruction of our precious State Forests.

One of the arguments for gas and oil drilling on our state land is that it is good for the Pennsylvania economy- that it brings jobs and economic activity- but at what cost? If we must counter with an economic argument- our sacred forests DO HAVE economic value-as they are!

They bring tourists to hike the Loyalsock Trail, to fly fish it's streams, they entice people looking to move here for the beauty and outdoor adventure possibilities, they help renew and relax our community- helping to keep us healthy and give us positive activities and inspiration.

I am an artist and local art business owner- I take inspiration from our pristine State Forests for my paintings.

Destruction of the natural world can also be subject matter for art. How sad it is to contemplate that the next time I visit Jacoby Falls I may see it destroyed for short term economic extraction.

Comment 66: Brock Stroup

I am contacting you regarding the Saluda access road, well pads, and staging area in the Loyalsock State Forest. The area where the proposed road will be constructed is a fragile and unique environment containing exceptional value (EV) streams and wetlands.

Bar Bottom Hollow is classified by PA Fish and Boat as a class A Brook Trout Stream. A large staging area that will be transitioned to a gas well pad is proposed to be built uphill of Bar Bottom Hollow. This threatens the EV stream with air and water pollution, sediment, and increased runoff from deforestation and development. The proposed road will cross 8 wetlands, requiring permanent infrastructure to be built over top of them. All of these impacts would degrade the current EV waters located in the state forest.

The DCNR and DEP are required by 25 Pa. Code section 105.18a, and the PA Constitution under Article I, Section 27 to act as a Trustee to protect and preserve the important and irreplaceable EV streams and wetlands resources of its State Forest Lands from degradation, and therefore I believe the subject permit application should be rejected.

Please consider siting drilling pads and associated infrastructure on adjacent private lands, not State Forest Lands, in order to access the subject gas lease area without any surface disturbance to State Forest Lands or EV waters.

Comment 67: Rose Risso

Stop destroying our forest! The Loyalsock forest is once again being assaulted by the Oil and Gas Industry! Preserve our forests a 3.9-mile access road, 6 well pads, 90 wells!!!, 8 native trout stream crossings, and a clear-cut 50' pipeline right of way, running down the mountain north of Jacoby Falls to Wallis Run Road. This will destroy natural habitat, deplete fishing and hunting, and put another burden on our depleted water system. The community does NOT want this!

Comment 68: Karen Kirk-Newman

Shale driller PGE's proposed Saluda Project is nothing but a destructive project that will scar OUR forests for generations to come. The name Saluda means to health. What a joke. There is nothing healthy about drilling, bulldozing, polluting water and air in OUR state forests.

This proposal in the Loyalsock State Forest includes a 3.9-mile access road, 6 well pads, 90 wells, 8 native trout stream crossings, and a clear-cut 50' pipeline right of way, running down the mountain north of Jacoby Falls to Wallis Run Road. We do not want anything like this in OUR forests.

Deny the Permit for PGEs Saluda Project.

Comment 69: Divia Feinstein

My name is Divia Feinstein and I am writing due to my concerns about the Saluda Access Road and Staging Area permit application. I was [REDACTED] and like many residents of the area, the trails and bodies of water of the Loyalsock State Forest have played an integral part in my life. Being raised in an area of such truly awesome preserved landscapes undoubtedly shaped who I am as a person and the trajectory of my life. In my undergraduate studies, I surveyed the lands of the Loyalsock State Forest for reptiles and amphibians. These are areas that are home to Timber Rattlesnakes -- a species that not only plays a crucial role as a predator in our native ecosystem, but one that is listed by the PA Fish and Boat Commission as a species of special concern. In the areas that will be affected by this proposed development, I have personally witnessed at least 10 species of salamanders living and breeding. Being amphibious and thus being at risk of taking up any contaminants in the water they are surrounded by, salamanders are highly susceptible to the pollution that has been documented following developments such as this. I believe that this project will be in violation of PA Code 105.18a. (Permitting of structures in wetlands) and as such, that the permit request should be denied. These lands taught me the importance of ecology; a lesson so strong and permeating that I have entered a PhD program specializing in ecology. While I may no longer live nearby while I pursue this career path, I frequently return home and always make it a point to appreciate the beauty that Pennsylvania prides itself so highly for protecting. I sincerely hope that you make the choice to continue preserving this irreplaceable environment.

Comment 70: Alannah Gabriel

Save Jacoby Mountain from wetland and stream degradation by PGE's Saluda Project. DENY THE PERMIT!

Comment 71: Travis Bickmore

I am submitting this comment in opposition to the Saluda Access Road and Staging Area Project proposed by Pennsylvania General Energy Co., LLC (PGE) in Cascade and Gamble Townships, Lycoming County.

I am a resident of Lycoming County with a direct interest in protecting water resources, public safety, and the long-term environmental integrity of our region. Based on the project location and scope, I believe the proposed activity presents unacceptable risks to a sensitive headwater watershed and does not adequately demonstrate that impacts have been avoided or minimized to the maximum extent practicable.

Headwater Watershed and Downstream Impacts

The proposed project is located within the Jacoby Falls headwaters, which drain to Wallis Run, then to Loyalsock Creek, the Susquehanna River, and ultimately the Chesapeake Bay. As a headwater system, this area plays a critical role in maintaining downstream water quality, regulating flow, and supporting ecological stability.

Land disturbance associated with new road construction and staging areas increases the likelihood of erosion, sedimentation, and stormwater runoff. In headwater environments, these impacts are magnified downstream, cumulatively degrading water quality, streambank stability, and habitat well beyond the immediate project footprint.

Given Pennsylvania's obligations under the Clean Streams Law and its commitments related to the Susquehanna River Basin and Chesapeake Bay restoration, new industrial disturbance in intact headwaters warrants the highest level of scrutiny.

Public Trust Resources and Community Value

Jacoby Falls is a locally significant natural feature and one of the few easily accessible waterfalls in Lycoming County. It is regularly used by residents for hiking, photography, quiet recreation, and personal restoration. Its accessibility makes it particularly important for families, older residents, and individuals with limited mobility who may not be able to access more remote public lands.

Under Pennsylvania's public trust doctrine, natural resources such as clean water, scenic landscapes, and ecological systems are held in trust for the benefit of present and future generations. Industrializing this area would permanently diminish both its ecological function and its value as a public resource.

Climate Resilience and Flood Risk

The increasing frequency and intensity of precipitation events associated with climate change amplify the risk of surface disturbance in this watershed. Road construction, soil compaction, and altered drainage patterns increase runoff volume and velocity during storm events, elevating the risk of flooding, sediment transport, and stream channel destabilization.

These impacts extend beyond the project area. Increased runoff and sediment loads in Wallis Run and Bar Bottom Hollow could exacerbate downstream flooding and erosion in the Loyalsock Creek corridor, affecting communities such as Montoursville. Upstream decisions directly affect flood resilience and public safety downstream.

Failure to Adequately Evaluate Lower-Impact Alternatives

Modern unconventional gas development commonly employs long horizontal laterals drilled from existing well pads to access subsurface resources over wide areas, thereby minimizing new surface disturbance. In many cases, laterals extending several miles eliminate the need for new access roads or staging areas in sensitive locations.

PGE operates existing well pads and infrastructure within Lycoming County and the surrounding regions. The application does not sufficiently demonstrate why development via lateral extensions from existing pads is not feasible, nor does it provide an adequate alternatives analysis demonstrating that the proposed project represents the least environmentally damaging practicable alternative.

Cumulative and Long-Term Impacts

New access roads and staging areas create permanent alterations to land cover and hydrology and often facilitate future industrial expansion. Incremental approvals of such infrastructure result in cumulative impacts that are frequently underestimated during individual permit reviews but have lasting consequences for watershed health and community resilience.

Conclusion

For these reasons, I respectfully request that DEP deny the permit application or require a substantially more rigorous environmental review that fully evaluates cumulative impacts, downstream risks, climate resilience, and feasible lower-impact alternatives using existing infrastructure.

Protecting headwaters protects all waters downstream. Once compromised, these systems cannot be fully restored.

Comment 72: Andy Middleton

I have had a connection with Sullivan County and the Loyalsock for over 60 years and am deeply concerned about the expansion of fracking and extractive industries in this fragile and precious natural region.

I strongly urge the Department of Environmental Protection to deny the permit to allow PGE's Saluda Project to spoil and permanently damage this natural jewel.

No matter your political leanings, it should be clear to everyone that the future of energy, whether in 10 or 100 years, will NOT be fossil fuels. If, in short-sighted pursuit of oil and gas extraction for quick profit at the expense of "Environmental Protection" and permanent ecosystem and water supply damage, more and more wild lands near my beloved Loyalsock will never again support the rich and integrated biodiversity that exists now.

Should we sacrifice the environment to "save" an outdated economic model, or should we save the environment and the natural resources of which Pennsylvania is richly endowed while new energy and economic systems are integrated? My vote is resoundingly in favor of PROTECTION OF NATURAL RESOURCES.

PLEASE DENY THE PERMIT!

Comment 73: Jsgro77

In Please do not allow PGE to drill through ANY of Loyalsock

Comment 74: Breanna Welty

I would like to express my concern regarding the construction of a 3.9 mile gas line within the Loyalsock State Forest. This will not only spoil the integrity of Jacoby Mountain and surrounding wetlands, but strip the livelihoods from hundreds of birds, insects, aquatic life, and other inhabitants of Loyalsock State Forest.

And as code 105 states DEP cannot propose a project unless it is fully ensured it will not pose a threat to the health and safety of life or is necessary to prevent it. Waste, risk of run off, deforestation are significant concerns regarding the construction of these well pads, in which violates DEPOSIT regulations.

However, disregarding any human-made concept or law, this fact remains: this is the only land we have, once it is destroyed (as granting Saluda Access will do) it cannot be restored to how it once was.

As a young adult [REDACTED], I urge you to consider the irreversible damage this project will make. Mine and future generations will look to the actions taken of those before us who either sustained the beauty and life of our vastly rich lands, or contributed to the destruction of a world which is already sick. To deny these permits would be a gift to the world, and the generations to come.

Comment 75: Brette Confair

In Please deny the permit for PGEs Saluda project and protect Jacoby Falls. It is such a beautiful and well used hiking trail.

Comment 76: Chelsea Cramer

I respectfully acknowledge that the Loyalsock State Forest and surrounding lands are situated on the ancestral and unceded homelands of the Susquehannock people, as well as the Munsee Lenape and other

Indigenous nations who lived in relationship with these waters and forests long before Pennsylvania existed. Their stewardship reminds us of our responsibility to care for this land with humility and foresight.

My name is Chelsea Cramer and I [REDACTED]

[REDACTED] The forest, streams, and roads affected by this permit are part of the same connected landscape that shapes our daily lives. What happens on one side of the mountain does not stay there.

I am submitting this testimony to urge the DEP to deny Pennsylvania General Energy's Chapter 105 permit.

At its core, this decision comes down to a simple question: what do we owe to the people who live here now, and to those who will come after us?

The proposed 3.9-mile access road would cross dozens of streams and wetlands in an Exceptional Value watershed, in one of the most ecologically intact areas of the Loyalsock State Forest. These headwaters are not only environmentally significant; they shape daily life for nearby residents through water quality, drainage, erosion control, and the quiet enjoyment of our surroundings. When upstream systems are disrupted, downstream communities live with the consequences.

This project would convert a primitive forest into an industrial corridor, bringing heavy truck traffic, noise, dust, and long-term landscape fragmentation into an area currently defined by its natural character. It would limit public access to long-used recreational routes and permanently alter a place that many people rely on for hiking, hunting, birding, botanizing and peaceful reflection.

Experience elsewhere in Pennsylvania has shown that these impacts do not end when construction crews leave. Once a road like this is built, the change is lasting. Daily routines are affected. Trust in water quality is eroded. And the sense of place that draws people to live here is diminished.

Pennsylvania's Constitution is clear. Article I, Section 27 establishes that public natural resources are held in trust for the people, and that government has a duty to conserve and maintain them for present and future generations. That responsibility matters most when the pressure to compromise those resources is greatest.

Mitigation plans and future restoration promises cannot fully replace intact forest hydrology or recover lost wilderness character. Some decisions, once made, cannot be undone.

Denying this permit would affirm that Exceptional Value waters deserve exceptional protection, that public forests are not simply vacant land awaiting industrial use, and that the voices of nearby residents' matter.

I respectfully ask the Department to uphold its constitutional duty and deny the Chapter 105 permit for the Saluda Project.

Comment 77: Penny Lutz

In As a [REDACTED] am deeply troubled by the Saluda Project. Deny the permit. Save Jacoby Mountain from wetland and stream degradation by PGE's Saluda Project.

Comment 78: Karl Zimmerman

Please deny the permit for the so-called Saluda project. I've hiked the Loyalsock, back in the pristine days before fracking reared its ugly, greedy, and corrupt head. It's way past time for the EPA to do its job of actually protecting the environment rather than acting as a footstool for corporate rape of the Land.

Comment 79: Bob Lucus

Please do not allow drilling on Jacoby Mt. I am a regional resident. I chose to live in the region for areas like Jacoby Mt. Without drilling. In addition investing in fossil fuels is the wrong direction.

Comment 80: Morgan Benowitz-Fredricks

Please protect Pennsylvania's natural resources by preventing PGE's project at Jacoby Mountain. So many people have worked so hard for so long to protect (and remediate) our state's natural resources and waterways. The data about the ecological costs of roads, habitat fragmentation and the kinds of disturbance associated with projects like these is incontrovertible. This is not a place we should sacrifice for the financial gain of PGE.

Please protect our state land and deny this permit!

Comment 81: Susan Jordan

I am writing to urge DEP to deny the permit for PGE's proposed Saluda Project in Loyalsock State Forest. I have spent a lot of time on Jacoby Mountain and know what this project would mean for the area.

The Loyalsock State Forest is a public resource that supports recreation, wildlife, clean water, and local communities. A development of this scale threatens those values and the long-term health of the ecosystem.

This project, if allowed, would bring significant and lasting impacts. I understand it would include a 4 mile access road, six well pads, 90 wells, eight native trout stream crossings, and a 50-foot clear-cut pipeline right-of-way running down the mountain north of Jacoby Falls to Wallis Run Road. These activities pose serious risks to wetlands, high-quality streams, forest habitat, and the ecological integrity of Jacoby Mountain.

Please protect Jacoby Mountain from wetland and stream degradation.

Comment 82: Matt McTammany

Save Jacoby Mountain in Loyalsock State Forest from wetland and stream degradation by PGE's Saluda Project. DENY THE PERMIT!

Comment 83: Elizabeth Capaldi

Save Jacoby Mountain from wetland and stream degradation by PGE's Saluda Project. PLEASE, DENY THE PERMIT!

Keep the Loyalsock protected.

Comment 84: Mizuki Takahashi

I am an evolutionary ecologist who studies amphibians. My concern is how the project would affect hellbenders, a species of special concern in our state. Federal listing of this species under the Endangered Species Act of 1973 is also currently being evaluated. The proposed section may be devoid of the species, but siltation caused by the project will affect a long stretch downstream where hellbenders exist, and it is one of the major threats to the species, as it causes nesting and hatching failures. Careful assessment of the project's impacts on wildlife, particularly hellbenders, is crucial to protecting the keystone species and its ecosystem.

Comment 85: Charles Steffen

These type of projects chip away at our public lands in a negative way. It is getting more rare to have undisturbed areas in which to recreate and explore. Resource extraction should not be the highest priority in our public lands. Thank you for the opportunity to make a comment.

Save Jacoby Mountain from wetland and stream degradation by PGE's Saluda Project. DENY THE PERMIT!

Comment 86: Tasha Hall

Save Jacoby Mountain from wetland and stream degradation by PGE's Saluda Project. DENY THE PERMIT!

Comment 87: Tom Boyd

Save Jacoby Mountain from wetland and stream degradation by PGE's Sakura Project. DENY THE PERMIT!

Comment 88: Kathi Hannaford

Shale drilling construction, roads and bridges will damage wetlands and create stream degradation. This is

IMPORTANT!! Save Jacoby Mountain -- Deny the Permit!!

Comment 89: Julie Gates

Save Jacoby Mountain from wetland and stream degradation by PGE's Saluda Project. DENY THE PERMIT!

Comment 90: Lissa Ray

Save Jacoby Mountain from wetland and stream degradation by PGE's Saluda Project.

I am an avid angler and also an energy researcher. This pipeline is a potential disaster for this fishery with 90 proposed wells and 8 stream crossings. Every pipeline in the US has a history of leakage. Sometimes the leaks are small with few consequences but not when they occur near streams or aquifers. Leaks kill the fishery whether they are small or large. No company can guarantee this will not happen. It will. And who pays when it does? The taxpayer and the local communities. When will we learn that the benefits of pipelines are for the few top dogs and the burden is on the residents (including the fish) and those who pay for the clean up?

Comment 91: Lissa Ray

Save Jacoby Mountain from wetland and stream degradation by PGE's Saluda Project.

I am an avid angler and also an energy researcher. This pipeline is a potential disaster for this fishery with 90 proposed wells and 8 stream crossings. Every pipeline in the US has a history of leakage. Sometimes the leaks are small with few consequences but not when they occur near streams or aquifers. Leaks kill the fishery whether they are small or large. No company can guarantee this will not happen. It will. And who pays when it does? The taxpayer and the local communities. When will we learn that the benefits of pipelines are for the few top dogs and the burden is on the residents (including the fish) and those who pay for the clean up?

Comment 92: Jayne Kubat

Save Jacoby Mountain from wetland and stream degradation by PGE's Saluda Project. DENY THE PERMIT!

Comment 93: Gloria Renehan

I am writing about my concern regarding the proposed PA General Energy project on Jacoby Mountain. I am

Everytime there is a disturbance upstream it increases the risk of erosion and flooding. These companies can produce "experts " to tell you it won't happen because they will prevent it. But as you know the weather is changing and we are getting more and more intense rainfall events. Once these events happen they

can't be reversed, but the companies will still get their gas, sell out or go bankrupt and leave us to live with the environmental outcome.

For these reasons, I respectfully urge DEP to deny this permit application for the time being and continue to review the environmental impact.

Comment 94: Sara Jane Snyder

I am writing as a citizen of Pennsylvania to express my deep concern over the fact that a private energy company PGE could be granted access to the beautiful land around Jacoby Falls to drill wells and build industrial extraction infrastructure. Please deny this permit. Please protect Jacoby Falls and the beautiful rich ecosystem on which so many beings depend. Do not sell out our forest for short-term benefits and profits. Pennsylvania's forests are some of our greatest assets, and we must protect them.

Comment 95: Gloria Miele

Please deny the permit to PGE for the Saluda Project. Public lands like Jacoby Mountain should be for the public not for corporate profit.

Comment 96: Jon T.R. Droege

It has come to my attention that the area known as Jacoby Falls is under consideration for natural gas development by PGE. I implore you to reject all applied permits for this CC project. Not only is Jacoby Falls a breathtaking natural area, it is also one of the only accessible and easy hikes in the vicinity in which the natural beauty of the endless mountains region has been shared with a multitude of residents and visitors alike. We have been losing our precious natural wonders systematically to energy corporations, which are the soul of our heritage and identity as Pennsylvanians. Please choose no to this project.

Comment 97: Robert Cross

We have long enjoyed hiking in the Jacoby Mountain area, an absolutely beautiful area that should be preserved. In addition, the wetland and stream degradation that would occur from PGE's Saluda Project give further strong reasons to deny providing a permit for this project. We ask that you deny giving it a permit.

Comment 98: Heidi Walker

Save Jacoby Mountain from wetland and stream degradation by PGE's Saluda Project. DENY THE PERMIT!

I have been a local resident of 40+ years [REDACTED] and Jacoby Mountain has been a wonderful place for my family during that time. We have had so many memorable and beautiful moments there and would be devastated at its loss.

Please DENY THE PERMIT!

Do the right thing for our community - in these trying times, it will be remembered.

Comment 99: Caitlin O'Brien

Save Jacoby Mountain from wetland and stream degradation by PGE's Saluda Project. I am requesting that you deny this permit and protect Pennsylvania's beautiful areas.

Comment 100: Tom Duck

The proposed Saluda Project of PGE to create a 3.9 mile access road with 6 well pads for 90 wells is an example of why Article 1 Section 27 was enshrined in the Constitution of Pennsylvania. "The people have a right to clean air, pure water, and to the preservation of the natural, scenic, historic and esthetic values of the environment. Pennsylvania's public natural resources are the common property of all the people, including generations yet to come. As trustee of these resources, the Commonwealth shall conserve and maintain them for the benefit of all

the people.” Crossing/destroying 8 streams, creating a 50’ wide pipeline through the forest, adding a road and well pads is taking away our rights for clean air, pure water, natural, scenic, historic, and esthetic values.

We the people are more in need of a peaceful forest than ever for our health. Industrialization of the forest is not compatible with the Constitution. The lessors of the land have a responsibility to drastically minimize the damage this industrialization will inflict. The surface must remain intact if the subsurface is attacked. At the PGE first noncompliance citation the project should be halted. PGE has had issues with the Clean Streams Act. There should be no further excuses accepted by the lessor. Taking clean water from the Loyalsock Creek to make it toxic as it goes into a well to bring up gas to sell possibly overseas (highest bidder) makes little sense.

Pennsylvania electricity prices have gone up by 46.1% from 2018 to 2025 according to the Independent Fiscal Office largely due to Pennsylvania’s reliance on natural gas fired electric generation. More is not necessarily better.

PGE and DEP bear the responsibility for finding the best possible practices to minimize destruction now and the inevitable future consequences of this project.

Project Saluda nao es saludable.

Comment 101: Allison Mosher

I am writing to submit public comment regarding the Saluda Access Road and Staging Area Project proposed by Pennsylvania General Energy Co., LLC (PGE) in Cascade and Gamble Townships, Lycoming County.

I am a [REDACTED] and a frequent recreational user with a strong interest in protecting local water resources, public safety, and the character of our region. I am concerned that this project would introduce unnecessary industrial disturbance into a sensitive headwater watershed.

The proposed project affects the Jacoby Falls watershed, which drains to Wallis Run, Loyalsock Creek, the Susquehanna River, and ultimately the Chesapeake Bay. Disturbance at this upstream location increases risks of erosion, sedimentation, and flooding that extend well beyond the immediate project area.

Jacoby Falls is an important natural and recreational resource for the community. I find myself hiking, backpacking, biking, picnicking, birdwatching, etc. in this area throughout all seasons. This area of the Loyalsock State Forest is heavily trafficked and loved by outdoor enthusiasts like myself. It is truly a beautiful area. Its accessibility makes it especially valuable, and industrial development would permanently alter its character.

With increasingly intense rainfall events, new road construction and land disturbance raise serious concerns about stormwater runoff and downstream flooding, including impacts to Wallis Run, Bar Bottom Hollow, and the Loyalsock Creek corridor.

I am also concerned that feasible, lower-impact alternatives, such as horizontal lateral drilling from existing well pads, have not been adequately evaluated. Avoiding new surface disturbance in sensitive headwater areas should be a priority.

For these reasons, I respectfully urge DEP to deny the permit application or require additional environmental review and alternatives analysis before any approval is considered.

Comment 102: Sarah Caspar

We already know from past documents that Tithe fracking solution contains PFAS (the cancer. Causing and several other sever health injuries. It is used in the Teflon process, metal tubing process, fire retardants and is known as th ed forev...

Comment 103: Mark Spiro

Please protect this pristine area from development.
Stop PGE's Saluda Project.

Comment 104: David LaVerne

Please deny this permit that would ruin a sensitive ecosystem for generations.

Comment 105: Chris Benson

We are adamantly opposed to greedy PGE's intended sacrifice of Jacoby Falls strictly for profit. These companies are not to be believed in anything they tell locals. To approve this would be a major slap in the face to Lycoming County residents—and it will not go unnoticed like other drilling pads.

BAD MOVE.

Comment 106: Victoria Switzer

The residents of [REDACTED] have watched our forests fragmented, torn down, we have witnessed the destruction of stream, wetlands. Coveted “cricks” by the hundreds thousands, have been used to feed an insatiable industry as well as to provide a dumping place for toxic waste- I have seen it with my own eyes. I stood witness to the destruction of my own front yard, backyard. You must stand strong, against a powerful and negligent industry. Say NO, not this mountain, not this forest, not this time. I beg you to allow a piece of Pennsylvania’s soul to remain untouched by the path of pipelines, access roads, well pads, and all the “normal” operations that the gas industry requires. Be brave, be honest, do your job. Save one Mountain, protect it as if it were the last place you could take your family to experience the irreplaceable bounty of Pennsylvania’s flora and fauna.

You swore an oath to protect, it is your duty.

Comment 107: Isabelle Genest

I have had a connection with Sullivan County and the Loyalsock for over 40 years and am deeply concerned about the expansion of fracking and extractive industries in this fragile and precious natural region.

I strongly urge the Department of Environmental Protection to deny the permit to allow PGE’s Saluda Project to despoil and permanently damage this natural jewel.

No matter your political leanings, it should be clear to everyone that the future of energy, whether in 10 or 100 years, will NOT be fossil fuels. If, in short-sighted pursuit of oil and gas extraction for quick profit at the expense of “Environmental Protection” and permanent ecosystem and water supply damage, more and more wild lands near my beloved Loyalsock will never again support the rich and integrated biodiversity that exists now.

Should we sacrifice the environment to “save” an outdated economic model, or should we save the environment and the natural resources of which Pennsylvania is richly endowed while new energy and economic systems are integrated? My vote is resoundingly in favor of PROTECTION OF NATURAL RESOURCES.

PLEASE DENY THE PERMIT!

Comment 108: Jennifer Brown

Hello, I am a [REDACTED] employed locally. I am writing to ask that you please deny the permit for PGE's Saluda Project. Once our beautiful and environmentally significant natural resources are polluted, they can never be fully restored. I worked for multiple nonprofits in western PA that will never recover from the damage mining has done. Let's not make a similar mistake!

Comment 109: B. Arrindell

If Saluda is permitted, this project will bring decades-long destruction and degradation to a treasured and unique mountaintop ecology. The only “healthy” outcome will be corporate profits. The beauty and exceptional woodlands and wetlands of Jacoby and Cove mountains in the Loyalsock State Forest will be degraded both now and for the “generations yet to come” referred to in Article 1 Section 27 of the Pennsylvania Constitution. Pennsylvania General Energy’s 1,268-page application tells the story of how the extensive degradation of land owned by the Common Wealth will take place.

Under DEP’s regulations, which are the focus of this hearing, 25 Pa. Code section 105.18a, subsection (c), states that DEP cannot issue a permit for a project that “has a significant adverse impact on a wetland” unless the “project is necessary to abate a substantial threat to public health or safety.”

PGE’s permit application demonstrates that its proposed Saluda Project will have a significant adverse impact on unique exceptional value wetlands that are part of a constitutionally protected forest that DEP and DCNR must conserve and maintain as trustees. In addition to Chapter 105 regs, neither DEP nor DCNR can authorize the loss of these public natural resources under Article I, Section 27 of the Pennsylvania Constitution.

The Chapter 105 permit review process does not in any way circumvent DEP’s legal and constitutional requirement to conserve and maintain these unique exceptional forest and wetland resources, as well as DEP’s duty to preserve the natural, scenic, historic and aesthetic values of these public natural resources.

By decision of the Pennsylvania Supreme Court in 161 A.3d 911, 916 – the Pennsylvania Environmental Defense Foundation v. the Commonwealth in 2017, “The Commonwealth must manage our state parks and forest according to the plain language of Section 27, which imposes fiduciary duties consistent with Pennsylvania trust law.” Nothing Says This Project Is Necessary PGE’s permit application shows that the proposed project area is a core forest public natural resource with exceptional value waters and wetlands throughout.

Nothing in this permit application supports a finding that the Saluda Project is necessary to abate a substantial threat to public health and safety. To the contrary, the proposed project creates a substantial threat to the health and safety of anyone seeking to enjoy these public natural resources AND TO THE RESOURCES THEMSELVES.

You MUST DENY THE PERMIT to PGE's Saluda Project.

Comment 110: Jenni Slotterback

The proposed PGE “Saluda” Project will cause degradation to the watershed and wetlands in this area of the Loyalsock State Forest. It will impact the Jacoby Falls area and all those who enjoy these Public lands. I am amongst the many who have hiked these areas. I live in Lycoming county and have explored the Loyalsock State forest for the past 30 years.

Alternative nonsurface disturbance methods should be utilized to spare the proposed “Saluda” Project area from destruction. The DEP should uphold its responsibility to protect this Exceptional Value watershed. The DEP must help to preserve these Public lands for the present and for future generations to come.

Deny the PGE permit for the “Saluda” project.

Comment 111: Carol Troisi

I am asking you to deny the permit to PGE's proposed Saluda Project in the Loyalsock State Forest. Many of my family members and I have hiked the trails in the Loyalsock for years, and we want to be able to continue to do so with our grandchildren, and they with their grandchildren, for years to come. It is the mandate of the DEP to protect our state forests from degradation, which the Saluda Project would certainly cause. Please, for the sake of our forests and the wildlife that resides there, deny the permit for the Saluda Project!

Comment 112: Karen Elias

I would like to completely endorse, and second, the comments made by Barb Jarmoska regarding PGE's proposed Saluda Project. These exceptional land and waters must not be desecrated. Deny the permit!

Comment 113: Madison Cannon

I am writing to submit public comment regarding the Saluda Access Road and Staging Area Project proposed by Pennsylvania General Energy Co., LLC (PGE) in Cascade and Gamble Townships, Lycoming County.

I am a [REDACTED] with a strong interest in protecting local water resources, public safety, and the character of our region. I am concerned that this project would introduce unnecessary industrial disturbance into a sensitive headwater watershed.

The proposed project affects the Jacoby Falls watershed, which drains to Wallis Run, Loyalsock Creek, the Susquehanna River, and ultimately the Chesapeake Bay. Disturbance at this upstream location increases risks of erosion, sedimentation, and flooding that extend well beyond the immediate project area.

Jacoby Falls is an important natural and recreational resource for the community. Its accessibility makes it especially valuable, and industrial development would permanently alter its character. With increasingly intense rainfall events, new road construction and land disturbance raise serious concerns about stormwater runoff and downstream flooding, including impacts to Wallis Run, Bar Bottom Hollow, and the Loyalsock Creek corridor.

I am also concerned that feasible, lower-impact alternatives, such as horizontal lateral drilling from existing well pads, have not been adequately evaluated. Avoiding new surface disturbance in sensitive headwater areas should be a priority.

For these reasons, I respectfully urge DEP to deny the permit application or require additional environmental review and alternatives analysis before any approval is considered.

Comment 114: Lynn Fiedler

Save Jacoby Mountain from wetland and stream degradation by PGE's Saluda Project. DENY THE PERMIT!

Comment 115: Casey O'Neill

I am writing to submit public comment regarding the Saluda Access Road and Staging Area Project proposed by Pennsylvania General Energy Co., LLC (PGE) in Cascade and Gamble Townships, Lycoming County.

I am a recreational user with a strong interest in protecting local water resources, public safety, and the character of our region. I am concerned that this project would introduce unnecessary industrial disturbance into a sensitive headwater watershed.

The proposed project affects the Jacoby Falls watershed, which drains to Wallis Run, Loyalsock Creek, the Susquehanna River, and ultimately the Chesapeake Bay. Disturbance at this upstream location increases risks of erosion, sedimentation, and flooding that extend well beyond the immediate project area.

Jacoby Falls is an important natural and recreational resource for the community. My family has been making the trip up to Loyalsock State Forest from Philadelphia multiple times a year for over a decade now, in large part because of the incredible wilderness character still intact in the region thanks to your hard work. The peace and solace these public lands have afforded us the past few years has been invaluable.

Its accessibility makes it especially valuable, and industrial development would permanently alter its character.

With increasingly intense rainfall events, new road construction and land disturbance raise serious concerns about stormwater runoff and downstream flooding, including impacts to Wallis Run, Bar Bottom Hollow, and the Loyalsock Creek corridor.

I am also concerned that feasible, lower-impact alternatives, such as horizontal lateral drilling from existing well pads, have not been adequately evaluated. Avoiding new surface disturbance in sensitive headwater areas should be a priority. For these reasons, I respectfully urge DEP to deny the permit application or require additional environmental review and alternatives analysis before any approval is considered.

Comment 116: Isabela Salazar

Save Jacoby Mountain from wetland and stream degradation by PGE's Saluda Project. DENY THE PERMIT!

This Chapter 105 permit denial protects Jacoby Falls, the surrounding forest ecosystem, and crucial wildlife habitats, as well as the people that rely on this area for recreation- hiking, fishing, family gatherings or merely an escape for the insanity of today's society.

NO amount of money is worth destroying public land, especially when the organization that gains monetary benefit is doing at the detriment of their own mission.

It's plain and simple, this is PUBLIC land and should not be used for private benefits. This land belongs to the people and if development is allowed, we are the people being hurt by it, not the DCNR or DEP.

DENY THE PERMIT AND ALLOW THIS VITAL PIECE OF NATURE TO LIVE ON!!!!

Comment 117: Chase Bottorf

I am emailing regarding PGE's proposed Saluda Project at Jacoby Mountain. Save Jacoby Mountain from wetland and stream degradation by PGE's Saluda Project. DENY THE PERMIT!

Comment 118: Janis Wunschuh

PLEASE Deny the Permit to allow the gas industry to ruin JACOBY Falls MT/ trail !

Look what has happened to Susquehanna county and especially Dimock. I know first hand!

It has caused Many problems and the area is suffering. It looks fine but under ground is another story. Citizens do not speak up for fear of losing their loyalties. However, it is hush money and a very sad, depressing situation. We need DEP to look out for us and our families and our Beautiful land!!!!

Comment 119: Marie Simpson

I implore you to save Jacoby Mountain from the planned PGE Saluda Project. We need to protect the natural areas of Pennsylvania from these developments and preserve them for future generations.

DENY THE PERMIT!

Comment 120: James Wood

I am writing to ask that you DENY the permit application for the PGE SALUDA PROJECT in the Loyalsock State Forest. The proposed location for the well pads, access roads, and pipeline endangers a beautiful, peaceful and irreplaceable natural area in the state forest and will permanently degrade the area. I ask you to reject the permit application and save this special piece of Pennsylvania for the future enjoyment of the citizens of Pennsylvania and surrounding states, as well as for the wildlife that calls this area home.

Comment 121: Lena Yeagle

In My name is Lena Yeagle, [REDACTED]

I'm writing today to ask the DEP to be in compliance with its mission to "protect Pennsylvania's air, land, and water resources while ensuring the health and safety of all residents and visitors to the commonwealth". Specifically, as a lifelong resident of the Loyalsock forest system, I would like you to say NO to permit approval for PGE's Saluda project. It is the DEP's duty under its own mission statement.

I am aware that many organizations and individuals who share environmental concerns about this proposed permit have spoken, including: The Lycoming Audubon Society, Trout unlimited, and more. The negative potential impacts on local ecosystem function are, essentially, unable to be counted. Small scale problems lead to large scale ones eventually...

The disruption of and fragmentation to forest canopies affects native plant communities and opens vulnerability to invasive ones. We see the undeniable, negative effects too much already. Plants like stiltgrass <https://www.invasivespeciesinfo.gov/terrestrial/plants/japanese-stiltgrass>, Japanese Knotweed <https://www.nps.gov/articles/000/japanese-knotweed-acadia.htm>, Japanese barberry <https://extension.psu.edu/the-invasive-japanese-barberry>, multiflora rose <https://www.ecolandscaping.org/07/landscape-challenges/invasive-plants/multiflora-rose-an-exotic-invasive-plant-fact-sheet/>, garlic mustard <https://www.fs.usda.gov/database/feis/plants/forb/allpet/all.html> and many others, are taking over. Erosion, changes to soil chemistry and microbiological processes, broken plant to insect/bird/mammal interactions, food/habitat loss and even an increase in pathogenic illnesses, like lyme, are increasing as a result of rampant invasive plant colonies.

More on soil: Undisturbed, living roots in the ground are foundational to the health and stability of soil. Site disturbances, even on a minor scale, to complex forest systems, have great impact on soil structure (compaction/erosion/water infiltration), chemistry and biological processes (nutrient cycling and more). Non-disturbance is a wealth more valuable than mitigation, best management practices or anything else humans have come up with to try to justify industry in sensitive areas such as the Jacoby Falls region of the Loyalsock State Forest.

The impact of disturbing wetland and vernal pool habitat should ideally be criminal, but since it's not, in our current legal system, I ask you to consider the newts, frogs, turtles and other species who exist only because these systems are intact. I'm certain DEP sees the negative trending effects of site disturbance even among these few examples.

I ask that the DEP would acknowledge these invaluable systems, webs of life and interdependent relationships. Without them, there is no future. I am against this project, on the whole, and any future development of natural gas production in this location and areas like it. Don't give the permit to Saluda, which will deplete countless ecological systems in trade for short-sighted capital gain. Have integrity. Do your job.

Comment 122: Sally S.

I object to permitting PGE's Saluda Project in the Loyalsock Forest near Jacoby Falls.

Comment 123: Michelle Rupert

Hi, just wanted say deny the permit for PGE's Saluda project. Save Jacoby Mountain. We've had enough disruption from the gas companies in Pennsylvania already. We have to keep some places untouched. The money is just not worth it. Thank you

Comment 124: Andrea Silverstrim

Please do not give permission for the Saluda Project in the Loyalsock Forest near Jacoby Falls.

Comment 125: Michelle Rupert

In Hi, forgot to give my name and address. Michelle Rupert [REDACTED] I grew up walking to Jacoby Falls with my Grandparents who had a cabin on Wallis Run Road. Back then there were not near the houses that there are now. We've taken too much away from our wildlife already. We need to leave Jacoby Mountain untouched. We have two cabins on Butternut Grove Road now and hike there all time with my kids and Grandkids. Please deny the permit for PGE's Saluda project. Some things cannot be replaced. The gas industry has disrupted Pennsylvania enough already. Thank you

Comment 126: Mike Heyd

In Please deny the permit. It would destroy the true value of this beautiful Jacoby Mountain area. I would remind you what the Pennsylvania constitution says:

§ 27. Natural resources and the public estate.

The people have a right to clean air, pure water, and to the preservation of the natural, scenic, historic and esthetic values of the environment. Pennsylvania's public natural resources are the common property of all the people, including generations yet to come. As trustee of these resources, the Commonwealth shall conserve and maintain them for the benefit of all the people. (May 18, 1971, P.L.769, J.R.3)

Comment 127: Heather Adams

Save Jacoby Mountain from wetland and stream degradation by PGE's Saluda Project. DENY THE PERMIT!

Comment 128: Linda Stanley

In Jacoby Cove Mountains in Loyalsock State Forest will be degraded for generations by PA General Energy's "Saluda" Shale Gas Access Road staging area project in Lycoming County.

The word "Salud" is used for toasting health and well-being.

The only "healthy" outcome will be corporate profits.

Please protect this beautiful and pristine area of Pennsylvania.

The people have a right to clean air, pure water, and to the preservation of the natural, scenic, historic and esthetic values of the environment. Pennsylvania's public natural resources are the common property of all the people, including generations yet to come. As trustee of these resources, the Commonwealth shall conserve and maintain them for the benefit of all the people". Thank you for reading this email. EPA, please protect our environment, our earth.

Comment 129: Rebecca Cardin

I am writing to submit a comment regarding the permitting of the PGE Saluda Project.

This project is planned for the Loyalsock State Forest, one of the few areas of Pennsylvania not yet impacted by oil and gas development. This particular state forest has managed to weather the storm that is extractive industry in northern Pennsylvania. This has made this area a haven for those who were drawn to the region by the natural beauty that is rapidly diminishing in the state.

The impacts of clearcutting a 50 foot right of away for this project are immense. Habitat fragmentation plays a significant role in the movement of both flora and fauna. Studies at Fernow Experimental Forest have shown that hydraulic fracturing sites can impact 30 acres of forest surrounding each well. Ultimately, disruption of this type to previously unimpacted regions leads to serious ecological change. This impact is compounded by other environmental factors that fall out of our control such as shifts to temperature, shifts to weather patterns, and

expanded range for invasive species. New habitat fragmentation under these conditions makes the impact of these factors more profound and unpredictable.

This is a recipe for increased instance of zoonotic disease, increased invasive biomass, increases in vector species populations, reductions in pollinator species, and die offs of understory and overstory plantlife. The consequences of which spread beyond the area of construction.

This equates to conditions that will increase human disease burden, reduce subsistence hunting, reduce power reliability (due to limb debris associated with tree death), and increase the risk of forest fires within our ever drying landscape. Developing this region creates a risk! Preserving Loyalsock State Forest, on the other hand, serves as an asset to the commonwealth. Please do not approve permits for new development at this site! We have plenty of previously industrialized land to continue development.

Comment 130: Tina Mccafferty

I am writing to submit public comment regarding the Saluda Access Road and Staging Area Project proposed by Pennsylvania General Energy Co., LLC (PGE) in Cascade and Gamble Townships, Lycoming County.

I am a resident of [REDACTED] with a strong interest in protecting local water resources, public safety, and the character of our region. I am concerned that this project would introduce dangerous industrial disturbance into a highly sensitive headwater watershed. It is hard to believe such a project could even be considered after the catastrophic impacts that occurred when the Sunoco pipeline broke and spewed countless barrels of fossil fuels into the Loyalsock Creek just a decade ago.

The proposed project affects the Jacoby Falls watershed, which drains to Wallis Run, Loyalsock Creek, the Susquehanna River, and ultimately the Chesapeake Bay. Disturbance at this upstream location increases risks of erosion, sedimentation, and flooding that extend well beyond the immediate project area.

Jacoby Falls is an important natural and recreational resource for the community. Its accessibility makes it especially valuable, and industrial development would permanently alter its character.

With increasingly intense rainfall events, new road construction and land disturbance raise serious concerns about stormwater runoff and downstream flooding, including impacts to Wallis Run, Bar Bottom Hollow, and the Loyalsock Creek corridor.

I am also concerned that feasible, lower-impact alternatives, such as horizontal lateral drilling from existing well pads, have not been adequately evaluated. Avoiding new surface disturbance in sensitive headwater areas should be a priority.

For these reasons, I respectfully urge DEP to deny the permit application.

Comment 131: Mary O'Donnell

I want to state my objections to the Saluda Access Road and Staging Area permit application. The proposed activities will have an enormous and negative impact on the natural environment of that region.

I am a salamander biologist. Jacoby Falls and Dad Dad Chapman road are both sites which have a large, diverse population of amphibians which are likely to be negatively impacted or eradicated by changes in water flow, the increased runoff and sedimentation of small creeks and freshwater ponds, and the pollution generated by road construction and increased traffic along a permanent roadway. The majority of the salamander species in the region are lungless, making them particularly prone to dying from small changes in their micro habitats (such as changes to water flow patterns and runoff directions.)

The Chapman road area is home to Jefferson salamanders, *Ambystoma jeffersonianum*, in some of the vernal pools along the existing dirt road and significant habitat disruption may kill salamanders living below ground (as they commonly do for part of the year) or cause the destruction or abandonment of these breeding sites. Vernal pools fill and dry during the early spring and these long lived salamanders are highly site-faithful, meeting yearly for breeding and laying eggs in the same small pools over and over. If pools are destroyed, animals may be unable to breed at all. *A. jeffersonianum* is a species of special concern in Pennsylvania and deserves additional protection and concern when impacting this rare salamanders habitat.

While I have not personally verified this, I have also been informed that the Chapman road site is also a basking spot for timber rattlesnakes. These animals are in decline in all of our surrounding states, and are also highly site-faithful. They are also a species of special concern on the state so significant detrimental changes to their habitat should be avoided.

Comment 132: James Gardner

I am writing to express my strong opposition to the permit for PGE's Saluda Shale Gas Access Road in Loyalsock State Forest.

I believe this project will cause serious degradation to the forest through increased fragmentation. Furthermore, it poses a significant risk of increased erosion and sedimentation throughout the Jacoby, Wallis, and Loyalsock watersheds.

The Department of Environmental Protection's mission "is to protect Pennsylvania's air, land, and water resources while ensuring the health and safety of all residents and visitors to the commonwealth." Please explain to me how allowing a company to build a 3.9 mile road, 6 well pads, 90 wells while crossing 8 native trout streams and clear cutting a 50 foot pipeline right away lives up to this mission. The proposal by PGE is antithetical to everything in your mission statement and does nothing more than destroy and permanently change the very environment you are supposed to be protecting.

Do your job stated so confidently in your mission statement. Give the residents of Pennsylvania the assurance that you will stand on your principles to protect the environment for generations to come rather than prostitute those lands to benefit such a small few.

I urge you live up to your name and to protect Jacoby Mountain from forest, wetland and stream degradation by denying the permit for the Saluda Project.

Comment 133: Robyn Diakite

Save Jacoby Mountain from wetland and stream degradation by PGE's Saluda Project. DENY THE PERMIT!

Comment 134: Jon Engel

Hello. Thank you for taking the time to solicit input and insights from the local citizens who care about our natural resources such as Jacoby Falls. I feel this project area is misplaced in its current location so close to the Falls and the mountain that feeds that stream and forest features native in that area. We need to find balances between using natural resources, and preserving natural resources. That may be the "easiest and most convenient" area for PGE to install their road and the construction that goes along with well drilling, but it's too close to Jacoby Falls. There is only one Jacoby Falls and the unique and beautiful landscape and natural features cannot be relocated, whereas PGE can find another place to drill that isnt next to a precious natural resource.

> I request that you deny the Saluda proposal and protect our environment and natural resources as your main objective. This area is too important as a recreational area for humans and a pristine water source for many types of forest fauna and wildlife.

Comment 135: Karen Frock

I write to endorse the statements made eloquently by [REDACTED] and friends, Barb Jarmoska, Cynthia Bower, and Bruce Buckle.

Some of the last remaining vast forested waterways in Pennsylvania, supporting a cherished ecosystem critical for wildlife and people, are here in the Loyalsock Creek valley and the tracts leased by PGE from the Commonwealth.

PGE has already moved inexorably across the top of the Allegheny Ridge, imperiling the Loyalsock Trail, Ridge Trail, all its wildlife, and potentially humans living below. I am grateful the company no longer appears to plan a rim-to-rim high pressure gas gathering line across the creek, for its originally permitted proximity to my neighbors and route up two steep, landslide-prone slopes posed unnecessary risks. PGE had intended to route such a line under the forest to avoid impacts on the surface, in recognition of clearcutting's landscape and viewscape impacts.

With this same philosophy of "do no harm," and because technology has advanced to allow longer laterals draining greater distances, drilling from outside the state forest and avoiding the need for access roads and pipeline across and down the tops of the mountains could be accomplished, including accessing some of those resources from the Allegheny Ridge side of the creek. This would avoid further fragmenting the forest in this valley and watershed. The forests help give us fresh water, clean air to breathe, and control runoff in times of increasing floods in this already hazardous, although exceptionally scenic valley.

Over more than 40 years [REDACTED] we have noted the loss of wood thrushes, hermit thrushes, the veery, even the cuckoo, whose calls echoed through the trees at twilight and dawn. We are still blessed by the arrival of warblers and flycatchers that migrate thousands of miles to be here in these specific mountain forests and streams. They nest here and are integral to the web of life here. We still hear the orchestra of night sounds in spring and summer, when frogs and toads sing and insects keep the chorus. We watch Bald Eagles daily and see migrating raptors and waterfowl. This past autumn, I saw a Golden Eagle high in one of our white pines overlooking Loyalsock Creek. The eastern subspecies of these eagles depends on the forested Appalachian Range to live, breed, and migrate from Maine to southern states. These are not just local impacts, if this habitat is allowed to further degrade.

PGE is already altering the top of the Allegheny Ridge. On the Jacoby and Cove Mountain sides of Loyalsock Creek, DCNR and DEP should negotiate with PGE to allow and require access from outside the mountain tops, preventing (not minimizing) further surface impact on the Loyalsock State Forest, which belongs to all Pennsylvanians. The Clarence Moore Lands and the Rider Park subsurface leases demonstrate the benefits that can be obtained. If sacrifices made on the ridge can help to preserve the mountains facing it, there would be some saving grace.

Please honor our constitutional rights and the Commonwealth's legal obligations to protect and conserve these lands and waterways for present and future generations. Extract the resources, but stay off the surface.

Comment 136: Brett Renninger

I am writing to submit public comment regarding the Saluda Access Road and Staging Area Project proposed by Pennsylvania General Energy Co., LLC (PGE) in Cascade and Gamble Townships, Lycoming County. I'm a resident of Loyalsock Township and live only 6 miles from Jacoby Falls just off Warrensville Road.

With a strong interest in protecting local water resources, public safety, and the character of our region. I am concerned that this project would introduce unnecessary industrial disturbance into a sensitive headwater watershed.

The proposed project affects the Jacoby Falls watershed, which drains to Wallis Run, Loyalsock Creek, the Susquehanna River, and ultimately the Chesapeake Bay. Disturbance at this upstream location increases risks of erosion, sedimentation, and flooding that extend well beyond the immediate project area.

It is vital to the whole area giving residents a place to hike and explore nature. Jacoby Falls is an important natural and recreational resource for the community. Its accessibility makes it especially valuable, and industrial development would permanently alter its character.

With increasingly intense rainfall events, new road construction and land disturbance raise serious concerns about stormwater runoff and downstream flooding, including impacts to Wallis Run, Bar Bottom Hollow, and the Loyalsock Creek corridor.

I am also concerned that feasible, lower-impact alternatives, such as horizontal lateral drilling from existing well pads, have not been adequately evaluated. Avoiding new surface disturbance in sensitive headwater areas should be a priority.

For these reasons, I respectfully urge DEP to deny the permit application or require additional environmental review and alternatives analysis before any approval is considered.

Comment 137: Tonyehn Verkitus

Physicians for Social Responsibility Pennsylvania is submitting this comment to urge DEP to deny PGE's application for the Saluda Access Road and Staging Area Project, which proposes constructing a 3.9-mile-long permanent access road and staging area in Cascade and Gamble Townships, Lycoming County.

A permanent industrial road and staging complex in and adjacent to public forestland is a long-term, landscape-level impact, not a temporary construction inconvenience. The movement to de-pave our nation's protected lands has proven that the introduction of roadways to naive land not only converts intact forest into an industrial corridor and creates ecological and recreational losses, but that these impacts are irreversible.

New road corridors are well-known vectors for invasive plant introduction and spread due to disturbed soils, vehicle traffic, and maintenance regimes. Invasives can displace native understory communities, reduce biodiversity, and change fire and habitat dynamics. The permanent road would also bring: chronic noise/light disturbance and increased human access pressure (including off-road use), a lasting footprint that converts natural quiet recreation settings into industrial zones.

A new 3.9-mile permanent road fragments core forest habitat into smaller patches and creates a linear edge that changes temperature, moisture, wind exposure, and predator dynamics. Fragmentation reduces interior forest habitat needed by sensitive birds and mammals, increases nest predation and parasitism in edge environments, disrupts movement corridors, increases wildlife-vehicle collisions, and degrades the ecological integrity that Pennsylvanians rely on in public forests. These impacts are structural and lasting, they persist long after construction.

Road building on steep/forested terrain is one of the most reliable ways to deliver chronic sediment to streams, wetlands, and seeps through ditching, culverts, fill slopes, and repeated maintenance. Sediment loads can smother aquatic habitat and macro invertebrates, impair trout spawning gravels, increase turbidity and water temperature by removing canopy cover, destabilize stream banks and floodplain function. Because this is proposed as a permanent access road, the risk is not limited to a short construction window; it becomes an ongoing maintenance and stormdriven impact pathway.

In forested landscapes like this, small wetlands and headwater features provide outsized ecological value—baseflow support, cold water refugia, filtration, amphibian breeding habitat, and flood attenuation. Even “small” encroachments can cause: hydrologic disconnection (wetland drying or unintended pooling), altered groundwater/surface-water exchange, long-term vegetation shifts, reduced resilience during droughts and extreme rain events.

DEP should treat impacts to these systems as cumulative and functionally significant, not merely acreage calculations.

Furthermore, PGE’s Saluda Access Road and Staging Area crosses and directly affects wetlands associated with headwater systems in the Loyalsock State Forest landscape. Some of these wetlands are classified as Exceptional Value (EV) because they are located within a state forest, hydrologically connected to high-quality headwater streams, and part of an intact, relatively undisturbed forest ecosystem.

The proposed 3.9-mile permanent road, along with grading, fill, culverts, and a staging area, would permanently alter wetland hydrology, fragment wetland and forest habitat, increase sedimentation and runoff into wetland systems, and degrade wetland functions that cannot be fully restored or replaced.

Under DEP’s own regulations, and the focus of this hearing, 25 Pa. Code § 105.18a(c) expressly prohibits DEP from issuing a permit for a project that “has a significant adverse impact on a wetland” unless the project is “necessary to abate a substantial threat to public health or safety.”

PGE’s permit application demonstrates that the proposed Saluda Access Road and Staging Area Project will cause significant adverse impacts to unique, exceptional value wetlands located within a constitutionally protected state forest landscape. These wetlands are not isolated or replaceable features; they are integral components of a publicly owned forest ecosystem that DEP and DCNR are legally required to conserve and maintain as trustees for the people of Pennsylvania.

PGE has made no showing, nor could it, that this project is necessary to abate a substantial threat to public health or safety, as required by Section 105.18a(c). As a result, the PA DEP lacks the regulatory authority to issue the requested permit.

Beyond Chapter 105, Article I, Section 27 of the Pennsylvania Constitution independently prohibits DEP and DCNR from authorizing the degradation or loss of these public natural resources. The Environmental Rights Amendment establishes the Commonwealth as trustee of public natural resources, including state forests and their wetlands, and imposes an affirmative duty to conserve and maintain those resources for the benefit of present and future generations.

The Chapter 105 permit review process does not—and cannot—override or circumvent these constitutional obligations. DEP’s statutory and regulatory authority must be exercised consistent with its trustee duties, including the duty to preserve the natural, scenic, historic, and aesthetic values of public natural resources.

As the Pennsylvania Supreme Court made clear in *Pennsylvania Environmental Defense Foundation v. Commonwealth*, 161 A.3d 911, 916 (Pa. 2017):

“The Commonwealth must manage our state parks and forests according to the plain language of Section 27, which imposes fiduciary duties consistent with Pennsylvania trust law.”

Authorizing a permanent industrial access road and staging area that significantly degrades exceptional value wetlands within a state forest is incompatible with those fiduciary duties. DEP therefore must deny this permit application to comply with both Chapter 105 regulations and the Pennsylvania Constitution.

Comment 138: Emily Krafjack

I'm writing in opposition to the Jacoby Mountain Saluda Project. The Jacoby Falls area is an exquisite easy public access to some of the finest woodland habitat in the Loyalsock State Forest and therefore this area must be off limits from further shale gas development and pipeline infrastructure in efforts for conservation for the public good. In the years I've observed PGE's development it's been noticeable that they are a stellar bad actor and definitely not worthy of the public's trust to develop this promoted project area.

Comment 139: John Lorson

I am opposed to the permit allowing for the construction of oil production on Jacoby mountain.

Comment 140: Karen Howes

I was introduced to the Loyalsock State Forest, and the Loyalsock Trail and surrounding beauty in the early 1970s while participating in a weekend hike and overnight camping fundraiser for the American Cancer Society. I was already familiar with World's End State Park and Eagle Mere, as I had relatives living in Eagles Mere, and enjoyed the many happy family visits there. These fond memories of such a beautiful area are part of what prompted my husband and I to locate to this area in 1986 to make our permanent residence and raise a family in this place we call home.

One of the many things we love about this area is the Loyalsock Trail, Jacoby Falls, and all the hiking and biking trails and accessibility to nature that this area offers. The proposed Saluda Project in the Loyalsock State Forest would be a major threat to the beauty and natural setting we have enjoyed for decades. We have already had to adapt to other intrusions on our landscape, and this would add an additional wound to a pristine natural area. Please SAVE JACOBY MOUNTAIN from wetland and stream degradation by PGE's Saluda Project. DENY THE PERMIT!

Comment 141: Ralph Kisberg

In Within the mission of the PA DEP it is clearly stated you "will work with businesses" (and others) "to conserve and restore our natural resources." If you combine this with the fact that the Loyalsock Creek is an exceptional value (EV) waterway, and therefore you are obligated to look at cumulative impacts of the current proposed project as well as on the whole watershed, it may be easier to understand why there is a mounting public level of concern about the Saluda Project.

Approval of this plan as is now will cast the die as to all that will follow on the public land in the leased area, outcomes that can be anticipated, and those that cannot.

In Lycoming County we have seen the leasing of five COP State Forest tracts to the gas industry that comprise the closest access for the vast majority of residents of the Susquehanna River Valley and also the majority of Pennsylvanians, to State Forest Land overlaying the Marcellus shale. Of these tracts four now contain large, well maintained and orderly, vast industrial parks for gas extraction. Tracts 724 and 725 still do not, 15 years after they were leased.

There is no question that PGE has the legal rights to gas under Tracts 724 and 725. PGE, under its present ownership, is a company that obviously takes its environmental obligations seriously. It has spent quite a bit to come up with detailed plans for implementing best management practices and is sincere about attempting to see they will be followed by all the various contractors who will build out the project.

The problem for the Commonwealth on COP tracts 724 and 725 centers on the fact that PGE's plan is based on optimizing the mineral resource extraction under the leased tracts while DEP functions under the Pennsylvania

Environmental Rights Constitutional Amendment has more obligations as the Commonwealth is trustee of all PA public natural resources.

The proposed project area contains EV waters: flowing, intermittent and ephemeral streams, bogs and wetlands. 3 of a total of 11 bogs have a 9'-18' buffer from the project, all have under a 450' buffer. A minimum 1,000' buffer is recommended by credentialed sources somewhere in the application. Under DEP's regulations it is stated DEP cannot issue a permit for a project that "has a significant adverse impact on a wetland" unless the "project is necessary to abate a substantial threat to public health and safety."

The traffic alone, with diesel engine particulate pollution will cause impacts we may not know of and see for years to cite one potential example. PGE's tract record is another. PGE's application does not show the Saluda Project is necessary to abate a substantial threat to public health and safety, not in a region awash in fossil gas extraction.

The Marcellus Shale Coalition representative listed some public benefits of gas extraction in his testimony. PGE and other operators are producing gas in the leased Tiadaghton State Forest tracts, PGE is producing gas in the Loyalsock State Forest on COP Tract 726 also in the Loyalsock Creek Watershed but the placement of the infrastructure, though a disaster to many of us who had enjoyed that area for a lifetime, is generally drier, less close to streams that hold native trout and other habitat and species that indicate a healthy environment. PGE also has leases on two State Game Lands in our county, one adjacent to one of their 3 LSF leases.

They have private land leases to the east the development of which increases local economic impact over State Forest leases. If the southernmost 1 3/4 miles if the project is denied, the threat to Upper Jacoby Hollow and the indicator species that it harbors as well as the threat to the recently acquired by DCNR Bar Bottom Hollow, will be substantially lowered.

The main streams running down through both hollows are documented native trout habitat. Perhaps accessing from the surrounding private land to the north of the Commonwealth tracts, would preclude the necessity of further developing existing minimally developed Pad A and proposed pads B and G. Perhaps the area to north and east of Dad Dad Chapman Rd could serve as an alternative well pad that could serve most of the Bar Bottom Hollow without surface development. I do not know what an available solution is, only that PGE is highly motivated and if given parameters that better serve the Commonwealth's obligations, they will figure out alternatives, perhaps even something less than most financially optimal

PGE is an exception to most gas field developers in that it is wholly owned by one person without the burden of private equity breathing down his neck. That person is a native Pennsylvanian who has a good appreciation for the environment. He is an open and honest person. I can attest to that after a good number of hours of conversation with him. I just do not think DCNR has explained the value of these particular tracts to him as completely as they could if they took a longer and more complete view of their Constitutional obligation.

Perhaps the DEP can, and will work, at the Cabinet level, with PGE's owner, and the DCNR, and stand up for the future and take our Constitution and Exceptional Value waters seriously on this particular piece of public land.

Comment 142: Robert Middleton

I am writing to oppose granting PGE a permit for the Saluda project on Jacoby mountain. It will cause great and unnecessary damage to the Loyalsock creek and the surrounding watershed. Please deny this permit. My family has a house in this area, and we greatly value its natural beauty and the region's clean air and water.

Comment 143: John Zaktansky - Middle Susquehanna Riverkeeper Association

In reference to the permit request for PGE, please consider the following.

In 2018, our association successfully led the Loyalsock Creek to a PA River of the Year victory in an effort to raise critical awareness about the various issues facing the waterway, including those related to fracking and the potential harm to exceptional value water and the creatures within it.

In 2019, the Eastern Hellbender was named our state amphibian. It was a key part of our River of the Year messaging – some of the country’s best remaining hellbender habitat can be found in pockets of Loyalsock Creek. The state amphibian status was a welcome next-step to protecting the dwindling habitat of this keystone native species.

However, in September of 2022, a coffer dam on Loyalsock Creek washed out – a project related to a gas company that created a massive sediment plume that impacted some of the key hellbender habitat and ecosystem required for other vital species.

If all the pomp and circumstance of River of the Year and state amphibian declarations isn’t enough to offset potential gas-related impacts to the Loyalsock, how can we have any confidence that PGE can drill 90 wells on six well pads and create a four-mile-long access road, staging area and gas pipeline just hundreds of feet from Jacoby Falls and Loyalsock Creek without massive, irrevocable damage?

PGE is seeking permission to cross eight native trout streams and the number of potential access points for sediment issues in a waterway that is this fragile and critical for species such as the hellbender, native trout and other species is beyond concerning.

It is impossible for any one agency to have its finger on the pulse of so many projects, especially with the growing demands and requests for new projects such as data centers on top of the numerous industries in our area. These data centers will spike a frantic push for natural gas that will lead developers to curb regulations and produce as much as possible as quickly as possible to stay relevant or get lost in the gold-rush-like shuffle.

Our region has been victimized ways too many times by this vicious cycle – lumbering and coal industries, fracking and now this new surge. Thankfully, we are seeing a massive push-back by citizen groups who are fed up with the greedy desires to expand production at the cost of our environmental resources. We’ve all read the Lorax, and yet we still see the same cautionary tale over and over.

It is time we have the same sort of definitive line-in-the-sand moment from our DEP. We understand that there are a lot of politics involved that make this messy and the letter of the law may be hard to decipher, but how about we simplify it to the three letters in the acronym of your name? You aren’t the Department of Access for Natural Gas Engagement and Rights (wouldn’t that be an ironically suitable acronym?), you are the Department of Environmental Protection.

We urge you to live up to that name when making the final decision on this permit.

Comment 144: Holly Shull

Our waterways and wilderness are a treasured resource here in Central PA. Deny the permit to PGE's Saluda Project!! Save Jacoby Mountain from wetland and stream degradation.

Comment 145: Margaret Lauver

NO NO NO!!!! This beautiful part of Pa has already been devastated!! Do not do this to our children, to the mountains, to the wetlands. To the Earth.

Comment 146: Ellen Davis

Hello, just heard about this awful plan at Jacoby Falls, from Melissa at [REDACTED]. What a Beautiful place to destroy. In the past I’ve hiked with friends there. It will take away the animal habitat , their food

source and all the humans in the area .The contamination of all the lands ,streams, lakes and rivers. WE SAY NO!!!! DENY THIS PERMIT!!!! I know Barb Jarmoka is so against this horrible idea. Thank You for Your time.

Comment 147: Reilsshera

In STOP THE DESTRUCTION OF OUR PA FORESTS AND WATERWAYS. ITS 2026 & FOSSIL FUEL COMPSNIES KNEW SINCE THE 70'S THE DAMAGE, DESTRUCTION & POLLUTION THEY ARE CAUSING.

YOU GREEDY AS PEOPLE NEED TO STOP NOW.

YOU GIVE THESE COMPANIES & DEVELOPERS EVERYTHING THEY WANT.

YOU ARE DESTROYING OUR WILD PLACES AND WILDLIFE .
YOU DONT GIVE A DAMN ABOUT NATURE YOU JACKASSES

Extensive drilling for natural gas and the development of related infrastructure degrades our state forest lands, and poses a significant threat to the birds and other wildlife that depend upon forested habitat. Fragmentation of contiguous forest lands, as well as noise from construction and drilling and hauling operations, threatens birds and other wildlife, and reduces the recreational value of forest lands.

Eastern forest birds are already in steep decline. According to the 2025 State of the Birds Report forest species have lost 27% of their population over the past 50 years. Industrial shale gas development is incompatible with the conservation mandate to protect state forest lands for birds and other wildlife.

This particular proposal, for the reasons given above, and for its proximity to the popular Jacoby Falls Trail and the apparent closure of other points of access to state forest land like Dad-Dad Chapman Road, represents another step in the wrong direction for a state that professes to promote its natural beauty and conservation ethic as reasons to visit and live in Pennsylvania.

For these reasons the Lycoming Audubon Society urges the Department of Environmental Protection to deny PA General Energy's permit application for the 3.9 mile access road and shale gas staging area in Gamble and Cascade Townships.

Comment 148: Melissa Farenish

I am submitting this comment in opposition to the Saluda Access Road and Staging Area Project proposed by Pennsylvania General Energy Co., LLC (PGE) in Cascade and Gamble Townships, Lycoming County.

I am a resident of [REDACTED] with a direct interest in protecting water resources, public safety, and the long-term environmental integrity of our region. Based on the project location and scope, I believe the proposed activity presents unacceptable risks to a sensitive headwater watershed and does not adequately demonstrate that impacts have been avoided or minimized to the maximum extent practicable.

Headwater Watershed and Downstream Impacts

The proposed project is located within the Jacoby Falls headwaters, which drain to Wallis Run, then to Loyalsock Creek, the Susquehanna River, and ultimately the Chesapeake Bay. As a headwater system, this area plays a critical role in maintaining downstream water quality, regulating flow, and supporting ecological stability.

Land disturbance associated with new road construction and staging areas increases the likelihood of erosion, sedimentation, and stormwater runoff. In headwater environments, these impacts are magnified downstream, cumulatively degrading water quality, streambank stability, and habitat well beyond the immediate project footprint.

Given Pennsylvania's obligations under the Clean Streams Law and its commitments related to the Susquehanna River Basin and Chesapeake Bay restoration, new industrial disturbance in intact headwaters warrants the highest level of scrutiny.

Public Trust Resources and Community Value

Jacoby Falls is a locally significant natural feature and one of the few easily accessible waterfalls in Lycoming County. It is regularly used by residents for hiking, photography, quiet recreation, and personal restoration. Its accessibility makes it particularly important for families, older residents, and individuals with limited mobility who may not be able to access more remote public lands.

Under Pennsylvania's public trust doctrine, natural resources such as clean water, scenic landscapes, and ecological systems are held in trust for the benefit of present and future generations. Industrializing this area would permanently diminish both its ecological function and its value as a public resource.

Climate Resilience and Flood Risk

The increasing frequency and intensity of precipitation events associated with climate change amplify the risk of surface disturbance in this watershed. Road construction, soil compaction, and altered drainage patterns increase runoff volume and velocity during storm events, elevating the risk of flooding, sediment transport, and stream channel destabilization.

These impacts extend beyond the project area. Increased runoff and sediment loads in Wallis Run and Bar Bottom Hollow could exacerbate downstream flooding and erosion in the Loyalsock Creek corridor, affecting communities such as Montoursville. Upstream decisions directly affect flood resilience and public safety downstream.

Failure to Adequately Evaluate Lower-Impact Alternatives

Modern unconventional gas development commonly employs long horizontal laterals drilled from existing well pads to access subsurface resources over wide areas, thereby minimizing new surface disturbance. In many cases, laterals extending several miles eliminate the need for new access roads or staging areas in sensitive locations.

PGE operates existing well pads and infrastructure within Lycoming County and the surrounding regions. The application does not sufficiently demonstrate why development via lateral extensions from existing pads is not feasible, nor does it provide an adequate alternatives analysis demonstrating that the proposed project represents the least environmentally damaging practicable alternative.

Cumulative and Long-Term Impacts

New access roads and staging areas create permanent alterations to land cover and hydrology and often facilitate future industrial expansion. Incremental approvals of such infrastructure result in cumulative impacts that are frequently underestimated during individual permit reviews but have lasting consequences for watershed health and community resilience.

Conclusion

For these reasons, I respectfully request that DEP deny the permit application or require a substantially more rigorous environmental review that fully evaluates cumulative impacts, downstream risks, climate resilience, and feasible lower-impact alternatives using existing infrastructure.

Protecting headwaters protects all waters downstream. Once compromised, these systems cannot be fully restored.

Comment 149: Tom Gebbie

I am writing to submit public comment regarding the Saluda Access Road and Staging Area Project proposed by Pennsylvania General Energy Co., LLC (PGE) in Cascade and Gamble Townships, Lycoming County.

I am a recreational user with a strong interest in protecting local water resources, public safety, and the character of our region. I am concerned that this project would introduce unnecessary industrial disturbance into a sensitive headwater watershed.

The proposed project affects the Jacoby Falls watershed, which drains to Wallis Run, Loyalsock Creek, the Susquehanna River, and ultimately the Chesapeake Bay. Disturbance at this upstream location increases risks of erosion, sedimentation, and flooding that extend well beyond the immediate project area.

Jacoby Falls is an important natural and recreational resource for the community. I come from a family of avid outdoorsmen and love spending time away from technology. Jacoby Falls is a crown jewel in Pennsylvania's wild forest areas and one of my favorite spots in the entire state. Its accessibility makes it especially valuable, and industrial development would permanently alter its character.

With increasingly intense rainfall events, new road construction and land disturbance raise serious concerns about stormwater runoff and downstream flooding, including impacts to Wallis Run, Bar Bottom Hollow, and the Loyalsock Creek corridor.

I am also concerned that feasible, lower-impact alternatives, such as horizontal lateral drilling from existing well pads, have not been adequately evaluated. Avoiding new surface disturbance in sensitive headwater areas should be a priority.

For these reasons, I respectfully urge DEP to deny the permit application or require additional environmental review and alternatives analysis before any approval is considered.

Comment 150: James Rowe

I am submitting this public comment to formally express my strong concern regarding any proposed construction, industrial, or energy-related development that may impact Jacoby Hollow Run, Jacoby Falls, and the surrounding lands north of Montoursville, Pennsylvania.

This area is a well-known and heavily used recreational resource for residents of the greater Williamsport region. The Jacoby Mountain and Jacoby Falls trails are valued not only for hiking and outdoor recreation, but also as a place of reflection, connection to nature, and community identity. Generations of families, hikers, anglers, and visitors rely on this landscape as a rare and irreplaceable natural space that supports both ecological integrity and public well-being.

Jacoby Hollow Run is a cold-water mountain stream that supports high-quality aquatic habitat, and the surrounding forested landscape contributes directly to water quality protection, erosion control, and wildlife connectivity. Any activity that risks degrading water quality, altering natural hydrology, increasing sedimentation, or fragmenting this landscape threatens both the ecological function of the stream and the public's ability to safely and meaningfully access this place.

Pennsylvania's antidegradation regulations require that existing uses of waters be fully protected, particularly where high-quality or cold-water fisheries are present. In addition, Article I, Section 27 of the Pennsylvania Constitution affirms that the people have a right to clean air, pure water, and the preservation of the natural, scenic, historic, and esthetic values of the environment. It further establishes that Pennsylvania's public natural resources are the common property of all people, including future generations, and that the Commonwealth is a trustee obligated to conserve and maintain them.

Given this constitutional obligation, I respectfully urge the Department to apply the highest level of scrutiny to any permits associated with development in this area. The burden must rest squarely on the applicant to demonstrate that no degradation of water quality or existing uses will occur, that no feasible less-damaging alternatives exist, and that the proposed activity is fully consistent with Pennsylvania's antidegradation policy and trustee responsibilities.

Beyond regulatory thresholds, I ask the Department to consider the broader public interest served by preserving Jacoby Falls and its surrounding landscape. This area represents one of the increasingly rare places where residents can experience intact forest, clean flowing water, and natural beauty within close reach of their community. Once compromised, these values cannot be fully restored.

For these reasons, I respectfully request that the Department:

- Deny any permit that would result in degradation of water quality or loss of existing aquatic or recreational uses;
- Require comprehensive and site-specific environmental review, including cumulative impact analysis;
- Ensure full public transparency, including adequate opportunity for public comment and, if warranted, a public hearing;
- Uphold its constitutional duty to protect this landscape for present and future generations.

Thank you for the opportunity to submit this comment and for your consideration of the long-term environmental and community impacts associated with this sensitive and cherished area.

Comment 151: Brooke Woodside

Jacoby Falls has incredible significance in our lives & we love to hike it every year! My man and I fell in love out there. Please save Jacoby Mountain from wetland and stream degradation by PGE's Saluda Project. DENY THE PERMIT!

Comment 152: Ann Russell

Please do not allow this project to go through!!! Jacoby Falls off of Wallis Run road is such a gem. Please we need to protect and preserve places like this. It is our children's future to have a better place to live and enjoy the breath taking surroundings of such a special place! Please vote to stop this project!

Comment 153: Emily Marie

Save Jacoby Falls in Lycoming County!

Dear Pennsylvania Department of Environmental Protection, I am writing to submit public comment regarding the Saluda Access Road and Staging Area Project proposed by Pennsylvania General Energy Co., LLC (PGE) in Cascade and Gamble Townships, Lycoming County.

I am a [REDACTED] member hiker in the area with a strong interest in protecting local water resources, public safety, and the character of our region. I am concerned that this project would introduce unnecessary industrial disturbance into a sensitive headwater watershed.

The proposed project affects the Jacoby Falls watershed, which drains to Wallis Run, Loyalsock Creek, the Susquehanna River, and ultimately the Chesapeake Bay. Disturbance at this upstream location increases risks of erosion, sedimentation, and flooding that extend well beyond the immediate project area. Jacoby Falls is an important natural and recreational resource for the community.

I enjoy and love hiking in this outdoor spot and I appreciate all the land that's uncontaminated let's keep it that way Its accessibility makes it especially valuable, and industrial development would permanently alter its character. With increasingly intense rainfall events, new road construction and land disturbance raise serious concerns about stormwater runoff and downstream flooding, including impacts to Wallis Run, Bar Bottom Hollow, and the Loyalsock Creek corridor.

I am also concerned that feasible, lower-impact alternatives, such as horizontal lateral drilling from existing well pads, have not been adequately evaluated. Avoiding new surface disturbance in sensitive headwater areas should be a priority.

For these reasons, I respectfully urge DEP to deny the permit application or require additional environmental review and alternatives analysis before any approval is considered.

Thank you for considering my comments and for your role in protecting Pennsylvania's natural resources.

Comment 154: Dan Hagan - Virtual Public Comment 1

MR. HAGAN: Wonderful.

Good evening, everyone. Thank you for the opportunity to provide comments at today's virtual hearing. My name is Dan Hagan and I am representing the Marcellus Shale Coalition, which is a statewide trade association representing more than 150 energy companies from the upstream, midstream and downstream sectors. Our members are fully committed to working with local, county, state and federal government officials to facilitate the safe development of Pennsylvania's natural gas resources.

On behalf of the MSC, I'm here to offer our support for the approval of Pennsylvania General Energy's joint application to construct a permanent access road and staging area in Gamble and Cascade Townships in Lycoming County. Natural gas development is a cornerstone of Pennsylvania economy. With almost \$3 billion in state revenue paid by operators like PGE through the -, since 2012. Townships and counties alike are the direct beneficiaries of natural gas development. Lycoming County has seen over \$137 million flow in from the natural gas development.

In 2024 alone, Lycoming County received over \$2.5 million and Gamble and Cascade Townships received \$155,000 and \$218,000 respectively. Outside of the direct benefits procured by natural gas development, this industry supports thousands of families sustaining jobs, many in our most rural communities. Pennsylvania households using natural gas have seen statewide annual savings of almost \$9 billion when compared to 2008 crisis. Our operators work diligently to ensure the safe development of natural gas. You can see this meticulous work at hand within this 1,260 page application.

PGE and their contractors in consultation with landowners, the Department of Conservation and Natural Resources, Pennsylvania Game Commission, Pennsylvania Fish and Boat Commission and the U. S. Fish and Wildlife Service have conducted numerous studies such as water delineations, botanical surveys, MIS MET surveys, habitat assessments, hibernacula surveys, riverine assessments, among others.

It must also be noted that PGE will be improving the current state forest road which includes placing bottomless culverts or culverts six inches below the stream bed to maintain the natural stream of gradient where current - crossings exist. PGE will also be restoring temporarily impacted wetlands and other natural areas once construction is completed. This includes restoration of topography, soil and vegetation. Specifically formulated seed mixtures will be used in riparian areas and within wetlands to help reestablish plant communities.

In closing, this application is an example of natural gas development and environmental stewardship coexisted. These two things are not and do not have to be mutually exclusive. We can safely develop natural gas in Pennsylvania while protecting the environment. The opportunities natural gas has brought working families, communities and the state cannot be understated. And just looking back at last week is a great example how important natural gas is to keeping the lights on. For all these reasons, we encourage the Pennsylvania Department of Environmental protection to approve PGE' s joint permit application. Thank you so much.

Comment 155: Ralph Kisberg - Virtual Public Comment 2

MR. KISBERG: Okay. Yes. The proposed project area contains exceptional value waters, flowing, intermittent and seminal streams, bogs and wetlands. The three bogs are nine to 18 feet from - have a nine to 18 foot buffer. All the bogs are under 450 feet from the buffer. And it is recommended somewhere in the literature a thousand feet of bog.

It is known that under PA DEP Code 25 DEP cannot issue a permit for a project that has a significant adverse impact on a wetland unless the project is necessary to abate a substantial threat to public health or safety. PGE's application does not show the Saluda project is necessary to abate a substantial threat. Public health and safety. Not in this region - fossil gas extraction.

Phrases in PGE's applications such as intends to adhere, intends to follow, to the extent practicable, inadvertent disturbance and 12 separate violations of the Clean Streams Act during the construction of the Shawnee Water Withdrawal highlighted notability of more violations.

We all understand that the need for fuel that allows humanity to survive and get to this point in time where we now have the technology to move on from there. It is well understood that successfully overcoming the waste, environmental and health cost of burning fossil fuels cannot be an overnight or easily affordable transition. But many of us understand, most of us, it is something humanity must do in a timely manner.

PGE has a legal right to gas under track 724 and 725. They probably have the right to extract it on the surface of its tracks. But - could possibly cut this project off a mile and three quarters from the end from the southern terminus?

The reason being you could work on top with flatter and dryer. Start there. Find a well pad that you can do with your staging area that needs - you'll learn more about the area. You'll be able to figure out how to extract more efficiently.

DEP, can you stand up for the future and take our constitution exceptional value water seriously on its public land that is a source of much treasured clean water and serves us and other species so well. Thank you.

Comment 156: Bruce Buckle - Virtual Public Comment 3

My name is Bruce Buckle. It's B-R-U-C-E, B-U-C-K-L-E.

Thank you for the opportunity to testify. I'm the president of the Lycoming Audubon Society and speaking on behalf of our membership of approximately 350 individuals. Lycoming Audubon works to conserve and restore ecosystems and we use our voice to advocate for policies that help birds.

State forests are a vital asset that deserves the highest level of protection. Fragmentation of forest lands, as well as noise from construction and drilling threatens birds and other wildlife and reduces the recreational value of our state forests. Eastern forest birds are in steep decline, having lost 27 percent of their population over the past 50 years. Forest interior birds like warblers, thrushes, vireos, flycatchers and tanagers depend upon large contiguous tracts of forest to maintain healthy populations. Nearly a quarter of the 90 species of greatest conservation need listed in Pennsylvania's Wildlife Action Plan are forest interior birds.

The wood thrush is an iconic forest songbird impacted by projects like this one that fragment forests. Over the past 50 years, the wood thrush has lost more than 50 percent of its population. A - describes the flute like song of the wood thrush as God's music. And in 1931, a renowned local educator and naturalist, Charles Lose, while camping on the Lycoming - on the Loyalsock Creek, wrote that the song of the wood thrush feels ancient and solemn, carrying a sense of permanence, even as the natural world around it shows signs of loss and change. Today, can we still make that claim of permanence?

In June of 2024, expert birders David and Bobby Brown walked Dad Dad Chapman Road in the area of the proposed development. They identified 49 species of birds, including five wood thrush. They heard or saw ten different species of warblers, blue headed and red hide vireos. Their ebird list also included a ruffed grouse, a species in precipitous decline, and five scarlet tanagers, another iconic Pennsylvania forest bird impacted by fragmentation. Let's hope future birders find such diversity in Penn's woods.

The proposed development in our state forest is incompatible with a conservation mandate to protect state forest lands for birds and other wildlife and represents another step in the wrong direction for a state that professes to promote its natural beauty and conservation ethic as reasons to visit and live in Pennsylvania.

For these reasons, Lycoming Audubon urges the Department of Environmental protection to deny PGE's permit application for the access road and shale gas staging area. Thank you for your time.

Comment 157: Barbara Jarmoska - Virtual Public Comment 4

My name is Barbara Jarmoska, B-A-R-B-A-R-A, J-A-R-M-O-S-K-A.

I have previously submitted my written comment by email this morning. Pennsylvania General Energy has submitted a 1,268 page application for an industrialized fossil gas drilling operation in the Loyalsock State Forest. I have been granted three minutes to provide oral testimony on this application. That's about 400 words to let those present now at this hearing hear what I think of PGE's approximately 770,000 words. 400 to 770,000. That ratio is not unlike what many of us feel when reading laws and government agency regulations and wondering how those charged with protecting the health and welfare of citizens can ignore the laws and mission statements and rules prioritizing corporate strategies over the needs of citizens.

PGE's application claims that the company will minimize degradation while cutting through core forest to build a 3.9 mile access road and six well pads, drilling 90 wells, crossing eight native trout streams and clear cutting a 50 foot pipeline right of way, a portion of which is just 600 feet from the much loved Jacoby Falls. That claim of minimal degradation is utterly insane. It's not possible. Let's be real. The degradation that would result from the Saluda project approval would be massive.

I've lived a part of each of my 77 years at [REDACTED] [REDACTED]. I love this mountain. In spring, Jacoby's mountaintop vernal pools are teeming with amphibian eggs. In the driest months of a parched summer, I've watched Gravity Springs adding clear water to the prolific mountain wetlands of the forest's unique ecology. I watch in wonder as the ephemerals come to life each spring. Those almost reading laws and government agency regulations and wondering how those charged with protecting the health and welfare of

citizens can ignore the laws and mission statements and rules prioritizing corporate strategies over the needs of citizens.

This year, PGE is seeking to bring a radically different springtime arrival on the mountain. One where enormous earth moving equipment will wreak havoc and bring destruction to the fragile, very wet and altogether unique and precious ecology of this part of the Loyalsock State Forest. DEP has three viable legal pathways by which to deny the Saluda project permit. The language of the Chapter 105 regulations, the language of the Pennsylvania Constitution and settled law by the PA Supreme Court in 2017. I'd like to share the details of those options with everyone at this hearing, but my time is up.

Comment 158: Cynthia Bower - Virtual Public Comment 5

Cynthia Bower, C-Y-N- T-H-I-A, B-O- W-E-R.

My name is Cynthia Bower. I live at [REDACTED]. Since 1973 I have recreated in the state forest area of the Saluda project. I consider the land area of Saluda with its core forest, spectacular waterfall, roadless areas and exceptional value waters to be a jewel of Lycoming County. I have guided adults and children on educational outings to Jacoby Falls and delighted in their joy as they dashed under the curtain of water and explored the rock overhang. This was wilderness, a haven and the nature deprived and screen addicted culture to which we have become indifferent.

On my [REDACTED] I have a non-service disturbance gas lease. I am not opposed to infrastructure and activities that are developed in ways that do not harm the public's natural resources as guaranteed by Article 1, Section 27 of the State Constitution, the Environmental Rights Amendment.

In reviewing PGE's application, the ERA, Chapter 93 and 25 Pennsylvania Code Section 105 18A as statutory law under the ERA, DCNR and DEP are mandated to uphold their trustee duties to conserve and maintain the public natural resources of our state land per a 2017 Pennsylvania Supreme Court opinion. I do not believe Saluda meets these mandates.

Impacts to the ecology of the core forest as a whole and the exceptional values of the natural streams must be studied holistically before any declaration of potential non degradation. Optimum siting must be that which is in accord with the ERA, not TDE. The degradation that has taken place due to PGE's gas development on the Allegheny Ridge to the south and east of Saluda is jaw dropping and beyond comprehension. I have driven the - road out this ridge all the way to the pad at the western end to witness the unconscionable destruction of core forest and Headwaters land.

The Loyalsock Trail, built and maintained by volunteers and traveled for years by me and thousands of others, has been forever changed. As a public trust beneficiary, I am harmed and horrified at the blatant desecration of what was extensive and integral state forest, now no longer forest, but an industrial fragmented landscape punctuated by a patchwork of trees. How is PGE permitted to destroy the natural forest values to which I am entitled to enjoy? On the Allegheny Ridge and in other state forests, DCNR and DEP have failed to protect my rights and those of all beneficiaries under the ERA.

The concerns outlined above are brought to center stage on the Allegheny Ridge. This travesty must not happen with Saluda. Enough is enough and even already too much. Saluda as proposed must be denied. It remains to be seen whether our constitutionally bound Commonwealth trustee of the will, strength of mind and courage to do so. Thank you.

Comment 159: Beth Jones - Virtual Public Comment 6

Beth Jones, B- E-T- H, J-O-N-E-S.

I run a nonprofit in this area called Deep Green Journey and as such conduct forest therapy and backpack trips throughout the Loyalsock State Forest. The region in question this evening, including the streams around Jacoby Falls, is a region that is - has some of the most pristine Beauty in the Loyalsock State Forest. It includes - Apollo, which is this beautiful valley of waterfalls and rock formations down a narrow canyon into the Loyalsock Valley that I understand would be closed off as we understand that that Dad Dad Chapman Road will be restricted.

I know that money is a big factor in gas development and I ask the DEP to also consider the money loss as we destroy acres of one of PA's best and most lucrative resources, the outdoor industry. It brings in \$19 million each year to our state. People come to attend Deep Green Journey events from outside of our state as well. Maryland, Ohio, Delaware, even as far as South Carolina and Texas. And they don't just spend money for the event, their just trips also include local economy, hotel, gas, restaurants. Hunters, fishermen, hikers, backpackers, mountain bikers, birders, all will be impacted by this decision to bring destruction on this well-known and often visited beautiful section of the Loyalsock State Forest. Outdoor recreation, as I said, brings in \$19 billion just last year alone, or two percent of the GDP of our state. Fracking only 1.3 percent. And yet we want to give away our most precious resource.

I can understand why there's public opposition and rejection by private landowners to this road. This is on top of the habitat destruction to the forest. I have witnessed the clear cutting of access road across the valley near the Bryan Hay Trail and the Allegheny Front, as was just mentioned, where the Loyalsock Trail crosses numerous times. It has turned what was a beautiful section of that forest and of the Loyalsock Trail into a wasteland of ruts and stumps, unrooted trees and mud.

It's not just the streams on this road that will - that this road will cross that are rated exceptional value, but the vernal pools located towards the top of the mountain as well as every wrinkle of these mountains and valleys that house a unique habitat for all sorts of organisms, both seen and unseen. And while there is a promise of restoration, there is no bringing back those habitats that have existed and flourished for decades. By cutting a large swath across this forest, you're destroying a cycle that continues on and on. What's not seen is the disruption of feeding and greeting for countless creatures. And while we admire the resiliency of nature, for how long will we continue to destroy pieces of habitat in the name of profit? Thank you.

Comment 160: Mary Ann Stanton - Virtual Public Comment 7

My name is Mary Ann Stanton, M-A-R- Y, capital A- N- N, Stanton, S- T- A-N- T-O-N.

I live in [REDACTED], so [REDACTED]. But I grew up in the [REDACTED]

And those are deeply embedded in my memories and are more than likely a huge part of why I'm such an avid hiker and forest enthusiast as an adult.

We walked that trail as a family, with friends, with our girl and boy scout troops. I even had a birthday hike for what I think was my 12th birthday, where a group of 15 or so girls hiked with my dad, God

bless him, to the falls and camped there overnight. My friend Maria actually fell and broke her arm, making an even more memorable birthday more so. We had to bring her out on my horse, meeting the ambulance at my driveway as we exited the trail. The valley that our house sat in remains beautiful and undeveloped to this day. Fish are still beautiful - are still bountiful in Wallis Run and the other streams and creeks that lead into or out of the area. Deer and wild turkeys still gather by the tens and twenties on the front yard and across the road and in the fields. Industrial development, building an access road and paths would irrevocably and seriously damage that. Not to mention the destruction it would cause the series of streams that crisscross the trails into the falls.

For the [REDACTED]

[REDACTED] We coexisted with hunters. My brother was an avid hunter, wearing glaze orange when we walked during the hunting season. Even my horse had an orange blanket. And an annual rattlesnake rodeo was held on our property for years, much to my horror. There are natural - they are multiple snake habitats on the space slated for development. We had special sneakers we wore when hiking that trail so much - as much because my mother grew tired of scolding us for muddy and wet shoes, as for the practicality of all.

This peace that you feel on that trail, especially as the falls verge on spiritual, the endless habitat for so much wildlife. Yes, even the snakes is so fully developed from the decades, no, centuries of uninterrupted peace and tranquility that any interruption, especially one this dramatic and irreversible, would change the character of the area forever.

I've seen firsthand the devastation that natural gas drilling can do to an area both in their active and dormant states. We all know that the drilling itself is only part of the story. The access roads, the water retention facilities, the increased traffic to and from sites, not to mention the drilling pads themselves, are - to all that the area represents. Thank you so much for this opportunity to speak.

Comment 161: Christine Bear - Virtual Public Comment 8

Hi, my name is Christine Bear, C-H- R-I-S- T-I-N-E, B- E-A-R.

So I would like to also say thank you for this opportunity to speak. I would like to share that I am a very fortunate person because I live [REDACTED].

[REDACTED] And like the person just mentioned earlier, we - that's just our go to in the summertime and even in the wintertime. We hike those falls a lot. I've always been grateful to have that beautiful hiking trail and area so close to my home.

I am an avid hiker and a person who enjoys being out in nature. So to not advocate to keep that area and especially Jacoby Waterfalls in the pristine condition that it is right now would not be the right thing for me.

So I'm asking under the DEP Chapter 105 regulations, this project, the Saluda project, must not be permitted. The risk that this project poses to the value of the water in the falls. Thinking about the children and the hikers who enjoy the water in the summertime. The native trout that I know live there and - all year long. They thrive on a healthy ecosystem. And all of the other forms of life that enjoy the water is too great of a risk. The exceptional value - people have talked about this. The exceptional value water source for the falls is threatened under this Project And the natural beauty of the waterfall and the exceptional value of water source must be protected. And especially the native trout that live there.

The Jacoby Falls area is beautiful and breathtaking. And it is our duty to preserve the water source at Jacoby Falls. Nobody is going to make more land as we all know. And with that being said, it is our responsibility to take care of the land that we are provided with before it is destroyed.

I volunteer to speak today not because I'm a public speaker, but because I really truly believe that it's very important to protect Jacoby Falls, it's exceptional value water source that is there. And like others have mentioned, there is no restoring that area to what it was before. The damage that will be done will be irreversible. And it's our responsibility to protect it.

So I'm asking you to deny PGE's access to and the Saluda project. And I also wanted to say, if I have time, thank you for all the other people that are speaking on behalf of Jacoby Falls to protect that precious land. Thank you.

Comment 162: Bridget Irwin - Virtual Public Comment 9

So I think the only thing I really have to say is that I've lived walking distance from Jacoby Falls and it was such a beautiful area that really just needs to be preserved. And it's kind of a unique perspective that I bring because I used to be married to the oil field until I realized that the things that they're using are proprietary. And they would let my husband die before telling me how to help him. So if they're willing to let a human die, what does that mean that they're going to do to protect our land? So with that, I think I yield the rest of my time to the next speaker.

Comment 163: Ryan Bahr - Virtual Public Comment 10

Good afternoon. I'd like to start off by saying thank you to DEP for setting up this hearing for the community to voice their concerns on this project. Sometime in my youth, PGE started their expansion of gas pads on the Allegheny Ridge, and my experiences in the state forest started to change. The night skyline on the ridge, which used to be speckled with stars, is now shrouded by lights from a series of gas well pads cut into the mountain. Once remote trails now intersect with pipelines and gas roads. I've seen firsthand the impacts of this expansion on fracking of both the wildlife of the forest and its recreation experience. And I feel it's time to stand up for the state forest that has given me so much.

The stream in Jacoby Hollow is classified by PA Fish and Boat as a natural reproduction trout stream. The road grade PGE plans to put into the existing Dad Dad Chapman Road will come within 200 feet of the head waters of this stream and continue just several hundred yards away, Uphill of the stream. The first three quarters of a mile of this gas road in the state forest will be built directly on top of an unnamed tributary to Wallis Run. On the other side of the mountain is a stream called Bar Bottom which is classified by PA Fish and Boat as a Class A brook trout stream. Pennsylvania State Fish. The construction of a four mile road so close to or directly on top of these streams with 20 permanent stream crossings and eight permanent wetland crossings will dramatically alter this watershed.

Trout are fragile fish. They need clean water, cold water and the appropriate gravel in the stream bed to spawn. This road will cause excess runoff and sediment to enter the stream which will damage trout spawning beds and decrease water quality.

The fracking process from the resulting well pads can contaminate the groundwater and surface water which feeds surrounding streams, causing an even larger impact to our watershed and our drinking water. And this water for fracking has to come from somewhere. An additional six well pads on the state forest will require millions of gallons for each well pad to complete their fracturing process. This water will be pulled from the Loyalsock Creek which is used by many in the community for fishing, boating and other recreation.

How will this affect the creek in times of drought and extreme heat? I'd like to conclude my comment with this. If you issue the Chapter 105 permit to PGE, you are continuing the narrative for the misuse of our state forest. Your role in our government is to protect the environment. We want clean water. We want healthy streams. And we want to be able to take our future generations to catch brook trout in our state forests.

How many other wild places in our forest will be lost in the future from this greed for energy development? Changes like this are not easily undone. You have a decision to make. Are you going to protect our state forest, watershed and drinking water? Will you allow the continued fragmentation of our forest and contamination of our streams so PGE can make a profit? Thank you.

Comment 164: Lauren Bahr - Virtual Public Comment 11

My name is Lauren Bahr, L- A- U-R- E-N,

Okay. Hi. My name is Laura Bahr. I was [REDACTED] and I spent a lot of time running around on state forest land.

I'm 27, so growing up in this region when I did, I saw firsthand the impact of the natural gas industry on these ecosystems as the industry exploded and brought light and noise pollution, increased emissions from fleets of heavy machinery and roads that scarred and fractured important habitats. I have watched and grieved as beloved trails are gouged, forests are cleared and the installation of well pads brings chaos to what had always been a calm refuge for me and many others. As both an avid outdoors person and a scientist, I care deeply about ensuring the accessibility and health of our forests for generations to come.

Drilling for natural gas is not an innocent or clean way of producing energy. A publication from researchers at Washington State University reports that flaring, the burning off of natural gas byproducts during extraction, is linked to increases in respiratory health related hospital visits in local communities downwind of these wells, a direct impact on human health. This is not something that has only been observed west of us. Multiple studies of Pennsylvania have found significant associations between fracking and severe asthma, increases in lymphoma cases near active gas pads and poor birth outcomes.

Additionally, there's the environmental impact associated with this project. A four mile permanent access road with multiple permanent stream and wetland crosses is by definition going to fracture habitats. A huge amount of waste is generated during the process of fracking. And even if this waste does not flow directly into our waterways, which we cannot ensure, it is taken to landfills where runoff, which can contain heavy metals and radioactive materials, makes its way into local waterways. Researchers in Western PA have recently found elevated levels of radium in freshwater mussels that live downstream of gas wastewater discharge points.

I am devastated to think of further destruction of the state forest that we are so lucky to recreate in, in the name of profit. I cannot quantify the good these forests have done for me and so many others. They are quite literally a priceless resource.

I believe that if we claim to love the woods, the environment and the region we call home, it is our responsibility to protect the health of all beings in and around this land. For this reason, I strongly oppose the approval of this project. Thank you so much for your time and for organizing this hearing.

Comment 165: Aaron Deffenbaugh - Virtual Public Comment 12

My name is Aaron Deffenbaugh, A-A-R-O- N, D- E- F-F- E-N-B- A- U- G-H.

Long last name there for you. To get started, I am a [REDACTED]. I'm not originally from this area. I'm actually [REDACTED]. [REDACTED] It's one of the original areas that started the steel industry. And that area just got basically demolished by the industry of that time. And I am really scared to see that kind of demolition happen in this area here.

One of the reasons I chose [REDACTED] was because of the forests that [REDACTED] has. Back home, we - I have to go very far to get away from this industrialization of energy and of the steel industry. And the [REDACTED] really lets you get free of that really easily with the vast trails and infrastructure that we have here for the wilderness exploration.

I'm also a film major here at [REDACTED], and last year, I believe three or four of the senior films were filmed in the state forests, and especially a few at the Jacoby Fall Trails. It's a really beautiful area, and it was very impactful for myself and I know my fellow students that we are able to go to this beautiful secluded area that doesn't have too many industrial parts to it, really close to a town like Williamsport.

We also, here in Pennsylvania, we have no national parks in our state. That means that the state forests are so much more important and we have to protect them so much more because there is no big federal government in charge of taking care of any of our forests. So these smaller state forests are so much more important, and we need to take care of them more. I know one part of Jacoby Falls is that natural gas pipeline there.

And that, in my opinion, is my least favorite part, because it brings you back to reality when you're trying to escape. When you're hiking, you're escaping from this industrialization, all of this technology. But then you have to be reminded of this industrialization, this modernization, just cutting straight through the beautiful wilderness that we have around us. Thank you.

Comment 166: Margaret Cronin - Virtual Public Comment 13

Margaret Cronin, M-A- R-G-A-R-E-T, C-R- O-N-I- N

Dad Dad Chapman Trail, Jacoby Falls, Loyalsock Creek. I have biked, hiked, swum, bird watched and rejuvenated in these trails and waterways of the Loyalsock Forest. I say this as if to credential my worthiness to comment on PGE's Saluda application, but the basic fact that I am a resident who drinks from this watershed and breathes our air is warrant enough to speak on the inadvisability of this proposed site.

DEP's own regulations state that DEP cannot issue a permit for a project that has a significant adverse impact on a wetland unless the project is necessary to abate a substantial threat to public health or safety. PGE's proposed project area is a core forest public natural resource with exceptional value waters and wetlands throughout. Nothing in this permit application supports a finding that the Saluda project is necessary to abate a substantial threat to public health and safety. Rather, industrial degradation resulting from the Saluda project would create a substantial threat to the health and safety of all beings in the vicinity.

Moreover, the Saluda Project will have a significant adverse impact on exceptional value wetlands that are part of constitutionally protected forest land that DEP and DCNR have a charge to conserve. In accordance with Article 1, Section 27 of the PA Constitution, neither DEP nor DCNR can authorize the loss of these

public natural resources. The Chapter 105 permit review process does not in any way circumvent DEP's law, legal and constitutional mandate to conserve and maintain these exceptional forest and wetland resources.

Furthermore, PGE claims that the only public trail needing protection is the Jacoby Falls Trail. In truth, Saluda Pad B would block Dad Dad Chapman Trail, a multi-use trail many use to access Jacoby Falls from the top of Jacoby Mountain. PGE's failure to acknowledge the Dad Dad Chapman as a state forest trail that belongs to PA Citizens is in the least negligent and at worst bad faith negotiation with our state officials.

I ask this of the men and women who work for DEP. Abide by the mission stated on your website, which says our mission is to protect Pennsylvania's air, land and water resources while ensuring the health and safety of all residents and visitors to the Commonwealth. Please fulfill your charge by honoring the logic and integrity of your own mission and regulations. We need you to truly be the Department of Environmental Protection, not the department of excessive permission for corporate interests. Interests that too often undermine the health of our beloved Commonwealth and all who live within it. Thank you so much for your time.

Comment 167: Brook Lenker - Virtual Public Comment 14

My name is Brook Lenker and it's spelled B- R- O-O- K, last name L-E- N-K-E- R.

So my name is - my name is Brook Lenker and I'm the Executive Director of Keystone Trails Association, or KTA. We're an organization that promotes and protects hiking trails and hiking opportunities in Pennsylvania. Before I came to KTA over four years ago, I directed the Frack Tracker Alliance, an organization that maps and studies the impacts of natural gas extraction in Pennsylvania and across the country. In that capacity for nearly a decade, I witnessed the ceaseless degradation of the environment caused by fracked gas development. It sickens me to think of the thousands upon thousands of repetitive violations and accidents committed by this industry. It's merely a daily occurrence. The industry's legacy is dystopian, leaving a wake of spills, leaks, habitat destruction and fugitive emissions. People are sickened, the quality of life eroded.

The residents of the Loyalsock Valley have already endured way too much angst from living near the truck traffic, noise, pollutional events, Deforestation, devastation and uncertainty over what comes next. The Loyalsock State Forest is a wild respite loved by so many Pennsylvanians. The Loyalsock Creek is one of the favorite rivers in the state and was declared river of the year in 2018. The headwater streams in the path of PGE's plans feed that very river.

When will the DEP actually say no, not here? At stake are treasured resources performing essential ecological functions. Access roads, well pads and pipelines have no rightful place on these public lands. The proposed actions inherently violate everyone's right to clean air, pure water and to the preservation of the natural, scenic and aesthetic values of the environment.

Enough is enough. The Commonwealth is making significant investments in trails and outdoor recreation. But industrializing our forests and waters sullies the outdoors and the outdoor experience. PGE's development scheme is contrary, absolutely antithetical to the goal of a more verdant, sustainable and beckoning Commonwealth.

Please deny a Chapter 105 permit for this unnecessary project. Thank you.

Comment 168: Gary Metzger - Virtual Public Comment 15

Okay, I am Gary Metzger, G-A-R-Y, M-E- T-Z-G- E- R, and I am past president of the Lycoming Audubon Society.

I worked for 32 years or so with the Department of Environmental Protection in the Water Quality Management Program out of the Williamsport office. And maybe most importantly, [REDACTED]

So most of what I had to say and more has already been said and better than I could say it, I think. And I agree with most of the speakers, and I think that this is the wrong project in the wrong place. And I think that the Chapter 105 permit application should be denied or disapproved. I'll talk a minute about forest fragmentation, I think, which is what hits me most about projects like this.

So Bruce talked about the impact on birds' populations and breeding, and that is a big deal. And I think it applies to amphibians and lots of other creatures as well. The loss of forest canopy, something that hasn't been mentioned too much I think, the forest canopy in place helps the ground, the forest floor, absorb water. It cuts down on runoff. So we're going to take out the forest canopy on this 3.9 mile and all the pads and what not.

And we all know that we're getting more extreme rain events with some regularity. So there's going to be a lot of runoff. The road itself is going to be an impervious surface, so all of that water is going to run off. Folks who have lived in the valley, the Loyalsock Valley, know about flooding events, severe flooding events. And I think that projects like this, taking a road up this stream valley, you're just bringing more runoff, a path down the streams to wreck the ecology of these trout streams and blast into Wallis Run and the Loyalsock and add to those kinds of problems. So I would add that. Wrong project, wrong place.

Thanks so much.

Comment 169: Ruth Steck - Virtual Public Comment 16

My name is Ruth, R-U- T-H, Steck, S-T- E-C-K.

Pennsylvania General Energy has submitted an application for significant industrialization of a unique and beloved portion of the Loyalsock State Forest. The entire acreage included in the Saluda project serves as source water for the Loyalsock Creek, which carries exceptional value designation. Under DEP's own Chapter 105 regulations, to repeat what others have said before me, which are the focus of this hearing, DEP cannot issue a permit for a project that has a significant adverse impact on a wetland unless the project is necessary to abate a substantial threat to public health or safety.

To deny the this permit, as is what should happen, would be to comply with the agency's mission and obligations to the citizens of Pennsylvania. Denying the permit would not only be a great gift to these citizen owners of these Commonwealth lands, but also to the nation and to the world writ large, as continued extraction of fossil gas is complicit in the greatest existential threat humanity faces.

Our planet's life support systems are collapsing at an ever accelerating rate. Permafrost is thawing, ice sheets are destabilizing. Floods and fires are ever increasing and ocean currents are weakening. These aren't distant threats, they're happening now, accelerated by policies designed to favor corporate profits over the urgent need to craft a truly sustainable human future.

Speaking in April 2024, Ban Ki-moon, former UN Secretary General, not only reminded his audience that climate change is the single greatest threat to a sustainable future, he also said a powerful truth that addressing the climate challenge presents a golden opportunity to promote prosperity, security and a

brighter future for all. Time is running out and the climate does not negotiate. Surely future generations will judge us not by our divisive politics, tweets and culture wars, but by whether we protected their right to a livable planet.

I urge DEP to enforce the very regulations this agency is obligated to uphold and deny the significant and illegal degradation that would surely come from PGE's proposed Saluda project.

Comment 170: Aiden Gscheidle - Virtual Public Comment 17

Thank you for your time everyone. My name is Aiden Gscheidle. That's A-I- D-A-N, G-S-C-H-E- I-D-L-E. I'm a [REDACTED]

[REDACTED]. Jacoby Falls is a special place to me. As the state website itself says, it is one of Pennsylvania's prettiest waterfalls. It is alarming to hear it is under threat.

There are folks on this call who are more ecologically minded than me, who have spoken quite eloquently on behalf Jacoby's non-human inhabitants. Our neighbors the trout, the birds, the waterfall, the snakes, the ferns, and I will add the newts. But I myself would like to tell you about some of the humans who spend time at Jacoby.

I have a friend who is a registered nurse at UPMC. On more than one occasion I've listened to her tell me about the exhausting and sometimes traumatizing realities of working in healthcare, especially during the pandemic. She has had people die in her arms. She goes to Jacoby Falls routinely to find solace and rejuvenation.

I have another friend who is in healthcare as a dietitian working with the dialysis community. She too has horror stories and feels chronically burnt out. She too goes to Jacoby Falls for rest and restoration.

I have another friend who is in the field of mental health. He frequently takes his young son to Jacoby Falls to get away and spend time in nature.

And one more friend who introduced me to Jacoby Falls. She's in food service. When I met her we were both working two jobs and I believe she's actually juggling three. We were opening for breakfast at 5:00 a.m. and then bartending until 12:00 or 12:30 at night. Just like my other friends, she routinely goes to Jacoby Falls for much needed R and R.

All of these folks I've mentioned are in the reproductive sector. They serve the critical function of keeping us alive and helping us restore when we're hungry, suicidal or sick. They're the ground level. They provide basic life support, but who supports them? The answer is nature does. It is well documented that spending time in nature, taking a break from the grind is vital for human flourishing. I have 11 empirical studies in front of me that report that nature is among the top places that people experience an expanded sense of well-being and connection to a higher or wider power.

Part of what makes nature, nature, is that it is natural, that it doesn't have a road or a gas pad or chemicals, trucks and cranes 600 feet away. You wouldn't want these things near your own house or your church if you're trying to nap or mourn or pray. We are already in danger of losing our natural places. This isn't about people's hobbies. This is about people's health. This has long term consequences for all of us. So for the sake of our nurses, servers, healers and anyone else who goes to Jacoby Falls to easily access and enjoy the woods and soak in nature, it must be left alone.

Please deny this permit. Thank you

Comment 171: Brian Wagner - Virtual Public Comment 18

Brian Wagner, I'm representing the Pennsylvania Council of Trout Unlimited. B-R- I-A-N, W-A- G-N-E- R.

The Pennsylvania Council of Trout Unlimited with its 12,000 members is a conservation organization committed to the protection and preservation of our exceptionally valuable cold water natural resources and their supporting wetlands. We welcome this opportunity to testify at this hearing.

We believe there are significant unacceptable risks and cumulative effects of a large number of permanent impacts in disturbed areas which will degrade important and irreplaceable EV streams and wetlands inherent in PGE's proposed project as presented.

DCNR and DEP are required by Chapter 93 and 25 PA Code Section 105.18 a in the Pennsylvania Constitution under Article 1, Section 27, to act as a trustee to protect and preserve EV streams and wetlands of the Commonwealth from degradation. And therefore the permit application as presented should be denied. Our concerns will be presented in writing also, but summarized as follows.

The subject PGE permit application supporting documents enumerate dozens of references to exceptional value streams and wetlands which will be permanently impacted, and that the proposal turned as chosen and proposed construction methods and BMPs to be used will only minimize but not eliminate impacts and degradation of those resources. No data or explanations are presented which support those practices as equivalent to elimination or prevention of degradation.

No alternatives are presented which consider siting drilling pads and associated infrastructure on adjacent private lands, not DCNR and state forest lands. In order to access the subject gas lease area, such an approach has been used by EQT to access gas leases in the nearby Clarence Moore tracks on Burnett's Ridge and Pleasant Stream areas without surface disturbances to state forest lands. Why is the apparent starting point for DCNR's review and comments limited to the pad locations optimal to PGE?

As required by 25 PA Code Section 105.18a, paragraph six, PGE must affirmatively demonstrate in writing and the DEP must issue a written finding that the cumulative effect of this proposed project and other projects will not impair the Commonwealth's EV wetland resources.

The application information indicates that the DCNR has worked with an approved proposed alternative with PGE. How does DCNR justifies its approval to this extensive gas development project on such an exceptional intact and undeveloped important core forest ecosystem when there may be alternative methods now technologically possible to access the gas lease area from outside the subject state forest lease tract and avoid the impacts and degradations to EV streams or wetlands? And I'm just about out of time, so I'll stop there. Thank you.