

Christopher Hogan
Project Manager
NYS Department of Environmental Conservation
625 Broadway
Albany, NY 12333-1750

Cricket Valley Energy (CVE,) Scoping Comments

Dear Mr. Hogan,

We acknowledge that Advanced Power has thus far submitted documents evidencing thoughtful environmental review of the site for Cricket Valley Energy (CVE) plant in Dover, NY. The documents and outreach workshops have addressed issues of environmental quality and safety that are of concern to the community. CVE has demonstrated an understanding of the unique site location in the Great Swamp and above the Harlem Valley Aquifer, each a treasured and vital natural resource in the Town of Dover and within the Housatonic Watershed.

While we are excited about the potential positive economic benefits the project will bring to the Town of Dover, we are concerned about the proposal to drill through the single source Harlem Valley Aquifer and into the bedrock to access the water necessary to the operation of the plant. We would like CVE to address the cumulative effects of drawing down on the water supply, especially when combined with Dover Knolls, the largest development in Dutchess County and upstream in Wingdale.

Given the size and complexity of the project, and its potential to negatively affect our water supply, the Coalition for the Responsible Growth of Dover (CRGD) recommends that DEC cause to be hired, and CVE fund the expenses of, an expert in hydrogeology like The Chazen Companies (Chazen) or Leggette, Brashears & Graham, Inc (LBG) to provide comments on the CVE DEIS and the FEIS on behalf of the residents of the Town of Dover. What is the contingency plan if the wells are less productive than CVE needs? If for some reason the Iroquois gas pipeline does not deliver the gas needed to power the plant, does CVE anticipate drilling for gas below the site should reserves be discovered? In any event, is CVE prepared to give an iron clad guaranty that hydro-fracking at the Dover site would never be used, for any reason?

Chazen and LBG, and their hydrogeologists Russell Urban-Mead (Chazen) and Thomas Cusak (LBG,) know the area and are well trained to provide review, analysis and recommendations that are beyond the scope of the expertise of the Dover Town or Planning Board, or the Dover Town Planner, AKRF. Dover needs its own expert to ensure the protection of the water supply and provide comments to Dover specifically. With all due respect to the hydrogeologists on staff at DEC, whose expertise is well recognized and respected, we believe Dover would benefit greatly from hiring its own expert hydrogeologist to review the documents from a perspective unique to Dover and without regard to the electrical needs of the nation, the positive revenue flow to Dutchess County and the State of New York, or the corporate strategies of Advanced Power.

CRGD monitored the Dover Knolls SEQRA process in part out of concern that the hydrogeology issues would not be adequately addressed. With that in mind, we hired Thom Cusak to review the Application, Scoping Document, DEIS, Draft FEIS and FEIS. We found deficiencies in the Applicant's hydrogeology sections, when finally submitted, which were serious enough to reinforce our belief that independent review with regard to water quality and quantity is crucial. Mr. Cusak's review of the Applicant's hydrogeology report was recognized as critical to the process and resulted in substantive changes in the FEIS. While we are very comfortable with the competency of DEC's hydrogeologists, we stand firm in our opinion that the Town needs an independent evaluation and that CVE should cover that expense.

In addition, we would like the Applicant to provide for economic reuse or dismantling of the plant once its useful life is over (30-40 years) so that the Town of Dover will not be saddled with another abandoned building that has even less potential for reuse than some of the buildings on the site of the former Harlem Valley Psychiatric Center.

In close, we wish to thank the DEC for taking on Lead Agency Status on Cricket Valley Energy; for working closely with our Supervisor Ryan Courtien, the Dover Town Board and the Dover Planning Board in order to ensure maximum participation at the local level; and for being accessible to local, regional and national conservation groups, and citizen action groups such as ourselves.

Respectfully,
Constance I. DuHamel
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(A Project of the Open Space Institute)
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