



Housatonic Valley Association

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June 28, 2011

Mr. Stephen M. Tomasik, Project Manager
NYS Department of Environmental Conservation
Division of Environmental Permits
625 Broadway – 4th Floor
Albany, New York 12233-1750

RE: Cricket Valley Energy Project Draft Environmental Impact Statement

Dear Mr. Tomasik:

The Housatonic Valley Association (HVA), founded in 1941 is among the oldest non-profit watershed conservation organizations in the nation, and is dedicated to preserving and protecting the natural character and environmental health of the Housatonic River and its 1,948 mile watershed, which includes the Ten Mile River watershed in New York. Our work in surface and groundwater protection issues is extensive. HVA reviewed the Draft Environmental Impact Statement (DEIS) and offers the following comments and recommendations for your consideration.

Section 3.2 Existing Conditions

The portion of the property located west of the railroad track is relatively undeveloped and is adjacent to the Swamp River. This portion of the property is within the New York Department of Environmental Conservation (DEC) Great Swamp Critical Environmental Area (CEA) for its natural resource value. HVA is pleased that Cricket Valley Energy, the Oblong Land Conservancy and the Friends of the Great Swamp have begun exploring ways to permanently conserve the portion of the project site to the west of the Metro North railroad tracks.

Section 4.2 Baseline Air Quality, Meteorology and Climatology

Thus far, the applicant has relied upon climatological data, particularly wind measurements, obtained from the Poughkeepsie Airport for air quality modeling.

Specific air dispersion models should be developed using **on-site meteorological data** to ensure that the dispersion modeling will indicate compliance with all state and federal requirements. The project site is within a valley that is topographically complex and may be subject to downwash from the exhaust stacks that would produce locally high concentrations of pollutants.

Section 5.4 Water Supply

HVA is pleased that the project will incorporate several water conservation measures to minimize water

use during construction and operation of the facility. The project will rely on groundwater wells for process and domestic uses. During the pump testing, two existing wells at Dover Knolls as well as many neighboring properties were monitored. The DEIS indicated that the water withdrawals for the proposed facility should not adversely impact neighboring wells. However, additional wells will be necessary to serve the new residences and commercial properties at Dover Knolls. These future wells were not considered in the DEIS.

HVA requests that the DEIS include a regional evaluation of the cumulative impact of the groundwater needs of this project, Dover Knolls and all other large developments within the Ten Mile River watershed either under construction or currently going through the local approval process.

Other Comments

We request that the each appendix be labeled with its subject as well as a number.

HVA appreciates the opportunity to comment on this project.

Sincerely,

Tonia Shoumatoff
New York watershed Manager

Elaine E. LaBella
Director of Land Protection