

**Stephen and Cate Wilson
50 North Chippewalla Road
Wingdale, NY 12594
Phone: (845) 832-6494
Fax: (845) 832-3334**

Fax

Date: August 5, 2011

To: Mr. Stephen M. Tomasik, Project Manager, DEC

Fax: 518-402-9168

Pages Including Cover: 4

Comments:

For consideration with Cricket Valley Energy DEIS and proposed plant development in Dover, NY.

Stephen and Cate Wilson
50 North Chippewalla Road
Wingdale, NY 12594

August 5, 2011

Stephen M. Tomasik, Project Manager
NYS Dept. of Environmental Conservation
Division of Environmental Permits
625 Broadway - 4th Floor
Albany, NY 12233-1750
Fax: 518.402.9168
Email: depprmt@gw.dec.state.ny.us

SENT VIA FAX AND EMAIL

Dear Mr. Tomasik,

Please include the following comments in the DEC's consideration of the DEIS for the Cricket Valley Energy project proposed for development in Dover NY.

- We are owners of approximately 9 acres just south and well within one mile of the proposed site, where we have made our primary residence for the last 17 years.
- The environment here in our area is one that we consider to be clean and quiet—a place to live, work and retire, where we can pursue activities such as gardening, camping, swimming, and outdoor living in general. The prospect and ultimate advent of a large scale (and potentially unnecessary) power plant in close proximity is not conducive to any of these pursuits for many reasons.
- We object strenuously to the limited amount of time allowed for residents to respond to the DEIS. The full document encompasses four very large books of detailed technical information, which would require months for even a well versed industry expert to digest. Those of us who live here are not experts—we are residents with full time jobs, commuting, and raising families—and we have limited time for review in any given period. Yet we were allowed barely two months from the publication of the completed DEIS on May 25, 2011 for a full review of all the important issues it contains. These are issues that could potentially effect the remainder of our lives here, our health, well-being, our children, our property values and our happy retirement—all of which are deserving of real time for a proper review of the DEIS.

The limited time allowed smacks of "steamrolling" or "railroading"—in other words, because CVE and its backers are large corporate entities, they are being allowed by the DEC to call the shots on their terms and push this project through, while we who live here should simply bow down and give in, or get out of the way. This is not democratic process as we understand it.

- Although CVE conducted a variety of tests for impact on water, air, noise, pollution, traffic, etc., none of these were of sufficient duration to be considered reliable in evaluating the full impact of the proposed plant in actual operation. Most were only one to two weeks in

duration and could not possibly take into account all of the variables that could potentially alter the results—for example, conditions at different seasons of the year, additional building projects in the area, increasing population locally and increased water usage resulting from any or all of these. Some also used basis points that should be considered irrelevant for our specific area.

CVE claims their plant would be the cleanest in the state—by US regulation they must meet the lowest demonstrated rates of emissions. This isn't saying much given that the lowest rates are likely from inefficient older plants and that many of the government studies used as basis points have not been updated since the early part of this century. The standard should be set against current and local area measurements within Dover specifically.

The DEIS also discusses "net" change over a relatively wide measurement area; however there is no specific discussion of how these standards could vary in areas like ours, closest to the proposed plant.

They cannot accurately predict the cumulative effects of the plant in operation for any type of impact. Modeling and statistics have been known to be erroneous before—they are after all human creations and only as good as their developers. Mark Twain once quipped "there are lies, damn lies and then there are statistics". Honest statisticians and modelers all know he was right.

In fact, Arcadis—the CVE environmental consultant who wrote the DEIS—was mentioned in a recent documentary titled "Mann vs. Ford" which aired on HBO. Arcadis was apparently wrong in that Ringwood, NJ case, since their client, Ford Motor Company settled with a large number of cancer victims.

- Noise, traffic and air pollution are of considerably greater concern during the lengthy construction period required to build the plant if it is approved. The DEIS again discusses sound, traffic and air impacts upon "the more distant residential properties", but does not specifically address impacts on locations in immediate proximity. Not only our home, but others and the Dover Middle School and High School locations will be impacted by this for three or more years if the project does not complete on schedule.
- The DEIS does not address issues related to prolonged exposure to the admittedly excessive noise and air pollution that will result from the construction process. Three years is a long time to suffer 50-70db sound levels, even if they are intermittent.
- We join with others in the community in requesting that the CVE plan not be approved until such time as an independent and unbiased expert of the Dover Town's choosing can complete an assessment of the potential impacts.
- The DEIS makes no accommodation for unexpected adverse impacts.
 - What if their models and projections are wrong? We know they could be.
 - What if some human error—and it only takes one single error—results in the loss of water supply, damage to property, damage to anyone's health? It would not be the first time that this has happened.

The DEC should require CVE to set aside funds sufficient for any reparations as a contingency against any and all possible failures and damaging effects that they have not foreseen.

Some level of contingency should be required, since the local community will bear the brunt of any difficulties and any adverse impacts that result from this project, despite the fact that we will gain very little from the plant in operation:

- a job count of only 25-30, most of which will be technical and may well be imported;
- a tax revenue base of only \$1MM or so, which is extraordinarily low given the \$1BN facility cost and potential revenue to be generated by plant operations;
- it is not even clear that we will benefit from improved, lower cost electrical supply.

- On a very personal note, we purchased this property later in our lives and have always intended that it would be our retirement—whether we live here or enjoy the benefits of a healthy profit from its sale. It is beautiful and we have worked very hard for 17 years to make it more so. It is OUR ENVIRONMENT and by anyone's standard, a power plant located virtually next door will not improve its value to us or to someone who might buy it. This puts half a lifetime's worth of energy and effort in jeopardy and makes a bright future seem less than the certainty that we have every right to expect it would be. I am sure that many of our neighbors feel the same.

Although the DEC may consider property value to be outside its purview, we ask that you do carefully consider the negative perceptions of real environment that will result from developing a power plant in such a beautiful, largely rural area. Consider requiring compensation from CVE for losses in local property value as part of an overall contingency fund.

Thank you for your consideration of these matters.

Sincerely,



Stephen and Cate Wilson