



June 14, 2013

**VIA EMAIL**

Christopher Hogan  
NYSDEC Headquarters  
625 Broadway  
Albany, NY 12233

**Re: Request for Extension of the Public Comment Period for the Modified Draft Air State Facility Permit for the CPV Valley Energy Center (Permit ID No. 3-3356-001361/00001)**

Dear Mr. Hogan,

Riverkeeper, Inc. (Riverkeeper) writes to request that the New York State Department of Environmental Conservation (NYSDEC) extend the public comment period for the modified Draft Air State Facility permit (Permit ID No. 3-3356-001351/00001) requested by Competitive Power Ventures, Inc. (CPV) for the CPV Valley Energy Center in Wawayanda, NY. The current deadline for submitting written comments on the modified draft permit is June 14, 2013. Due to the complex nature of this project and its potential to negatively affect the public health and environment of surrounding communities, Riverkeeper asks NYSDEC to extend the public comment period on the modified draft permit for at least 30 days.

Riverkeeper is a member-supported watchdog organization dedicated to defending the Hudson River and its tributaries and protecting the drinking water supply of nine million New York City and Hudson Valley residents. Riverkeeper is actively involved in litigation, advocacy, and public education surrounding the issue of shale gas extraction and related infrastructure, particularly because of the possibility of impacts on New York State's drinking water supplies.

Natural gas powered electric generating facilities can emit a number of harmful pollutants into the atmosphere, potentially diminishing the air quality of surrounding communities. As a result, it is critically important that the public be given the opportunity to understand the likely impacts, and to fully participate in reviewing and commenting on proposed facility controls. As this project is subject to NYSDEC's Environmental Justice Policy, additional time is warranted to ensure that members of communities in the environmental justice area have adequate opportunities to raise their concerns

Give the complexity of this project and the provisions of the modified draft permit, the current 30-day public comment period is insufficient and does not allow for meaningful public review. For many local residents, understanding and reviewing the various analyses contained in the modified draft permit requires securing outside technical expertise, which is difficult if not impossible to accomplish within the existing comment period. In order to provide individuals in surrounding communities, who will be most affected by this project, the opportunity to fully review the modified draft permit, contact technical experts, and present concerns to NYSDEC, additional time should be permitted for public comment and review.

Accordingly, Riverkeeper requests that NYSDEC extend the public comment period for the CPV Valley Energy Center modified draft Air Facility Permit for at least another 30 days. This extra time will help provide the people of Wawayanda and surrounding communities the opportunity to fully examine the provisions of the draft permit and meaningfully participate in the public comment period. In addition, we urge NYSDEC to schedule one or more public hearings in potentially impacted communities during the extended comment period, including one structured to communicate information to and receive comments from communities in the environmental justice area.

Thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Kate Hudson", written in a cursive style.

Kate Hudson  
Watershed Program Director