

February 7, 2021
Randy,

I have looked over the power-point slides you sent me regarding CHPE and agree that they need to provide significantly more detail regarding their plan and they need to work in close collaboration with the Hudson 7 in developing and executing their plan. Their suggestion to have Poughkeepsie Water to merely shut down for an hour or so while they lay cable near the intakes is concerning for its neglect of considering the strong tidal currents in this region and the history of contamination in this reach.

Regarding my first concern the tidal excursion—the distance that a parcel of water moves between consecutive slack waters—in this reach of the river can exceed 6 km. Thus, laying cable at a rate of ~100m/hour would place them within a tidal excursion for 120 hours of an intake as they lay cable along the 12 km reach spanning 6 km upstream and 6 km downstream of a single intake. Moreover, there is no location in the reach of the river spanning the Rhinebeck intake (mile 244) to the Lloyd Intake (mile 260) that is more than one tidal excursion from an intake. Therefore, any resuspension of material while working in this 16 mile reach of the river would be able to reach one of the intakes inside of 6 hours were the sediment to remain in suspension—which would be possible for the finer grain material. Thus, providing a 6 km buffer upstream from the Poughkeepsie intake to 6 km downstream of the Lloyd intake represents a 37 km reach of the river where they would be operating within a tidal excursion of a drinking water intake. At a speed of 100 m/hour it would take over 2 weeks under continuous operations to complete this reach, of the river is which shown in the map to the right.

My second concern is that they do not plan to sample for contaminants associated with petroleum compounds. With several well documented sites of petrochemical contaminated sediment along the Hudson's watershed in this region, such as the Central Hudson's site in Poughkeepsie, the resuspension of sediment along much of this reach may well contain petroleum-based contaminants, such as PAH's and Pyrene, and not be monitoring for these contaminants is a flaw in their plan.

Finally, it would be in the best interest of CHPE to take the utmost precaution in the vicinity of these critical drinking water resources. CHPE champions this project as "...ready to provide clean energy with the resiliency and environmental safety that New York and the rest of the nation demands:" This is a laudable goal—and they should adhere to this aspiration. Indeed, the potential downsides of contaminating the drinking water of 100,000 New York State residents, and the ensuing resultant public relation problems CHPE would face, would far exceed the cost of doing this project with the utmost care and addressing the Hudson 7's concerns about the current plan.



Bob Chant