



November 28, 2025

Jonathan Stercho
NYSDEC Region 7 Headquarters
5786 Widewaters Pkwy
Syracuse, NY 13214

**Re: Town of Lansing – Cayuga Operating Company LLC
SPDES Permit Renewal and Water Withdrawal Permit**

Dear NYS Department of Environmental Conservation,

Community Science Institute (CSI) is writing in response to the recently posted permit renewal applications for the Cayuga Operating Company LLC, including the revised SPDES permit and the renewal of Water Withdrawal Permit WSA #11,753. We appreciate the opportunity to comment and wish to acknowledge the Department's ongoing work to reduce the environmental impacts associated with the former Cayuga Power Plant on Cayuga Lake. As the DEC proceeds with review of the applicable permits, CSI respectfully submits the following requests and comments:

1. Request for a Public Hearing on the Revised SPDES Permit: The Cayuga Power Plant has been closed for more than five years. Given the facility's long operational history and its legacy impacts on Cayuga Lake, we believe that meaningful public engagement is essential as the DEC evaluates the revised SPDES permit. CSI formally requests that the Department hold a public hearing to allow community members, scientists, and stakeholders the opportunity to review and discuss the limits and conditions proposed in the updated permit.

2. Request for a 90-Day Extension for Review of SPDES Permit Amendments: CSI also requests a 90-day extension to the comment period for the SPDES permit amendments. This additional time is needed to ensure a thorough and scientifically grounded review of the proposed changes, particularly in light of the potential long-term impacts on Cayuga Lake's water quality and ecological health.

3. Request for Extension and Document Release for Water Withdrawal Permit (WSA #11,753): In addition, CSI requests an extension to the comment period for Water Withdrawal Permit WSA #11,753. To support an informed review, we also request the electronic release of all documents related to this permit, including technical analyses, monitoring data, engineering assessments, and correspondence relevant to the plant's historical and current water withdrawal activities.



4. Need for Clarification Regarding Environmental Protections and Long-Term

Impacts: While we support the DEC's continued efforts to reduce the environmental impacts associated with the shuttered power plant, we respectfully request additional clarification on how the proposed permit limits will address concerns related to the facility's historical operations. Specifically, CSI seeks a clearer understanding of how these limits are designed to protect Cayuga Lake from long-term impacts associated with past discharges, thermal loading, sediment disturbance, and other legacy effects.

Thank you for your attention to these requests and for your ongoing commitment to protecting the water quality and ecological integrity of Cayuga Lake. CSI remains available to provide data, analysis, and community-based monitoring support as the Department completes its review of these permits.

Respectfully,

Grascen Shidemantle, PhD
Executive Director
Community Science Institute