

January 12, 2026

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,

On behalf of Community Science Institute (CSI), we thank and commend the DEC for extending the public comment period for the permit renewal applications for the Cayuga Operating Company LLC, including the revised SPDES permit and the renewal of Water Withdrawal Permit WSA #11,753. In our initial comments on the permits, we also requested that a public hearing be held on this matter. We understand that the DEC has until January 26, 2026 to make a determination about a public hearing. **In this letter, we are again respectfully requesting that the DEC 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 permits as well as their relevance in terms of past and future site uses.**

CSI is a community-based 501(c)(3) organization and state-certified water testing lab that has partnered with hundreds of volunteers and stakeholders across Central New York since 2000 to monitor water quality. Part of our mission is to inspire and empower communities to safeguard water resources by cultivating scientific literacy. Providing a forum for residents to ask questions about these permits allows them to build a greater scientific understanding of the permit requirements including how they relate to past, current, and future uses of the facility. With talks of a proposed data center in the former Cayuga Power Plant getting increased attention, it is critical that our community have the opportunity to hear from the DEC directly on the matter of these permit applications.

The following are specific questions that we would like to be addressed during a public hearing to add context to the permit applications:

- What are the known environmental impacts from the former Cayuga Power Plant? How has the legacy of that contamination impacted water quality in Cayuga Lake?
- What has DEC already done to address the Cayuga Operating Company as a potential source of environmental contamination?
- What is DEC proposing to do going forward to protect Cayuga Lake from residual contamination at the Cayuga Operating Company?

- The Power Plant has been closed for five years. The current permits were issued for a coal-fired power plant. However, as noted in the permit renewal applications, the use for this plant has changed. What is the current site use of the Cayuga Operating Company? How do the terms in the permit applications align with that site use? For example:
 - o Why does the plant need approximately 1 million gallons of water per day from Cayuga Lake if the generation of electricity has been discontinued and the coal-fired boilers have been removed? What is currently being cooled with this water and what would be cooled under the water withdrawal permit renewal?
 - o While we recognize that the proposed SPDES permit changes and water withdrawal permit are in many ways more protective than the previous permits (e.g., reduced flow limits, added monitoring in terms of both frequency and types of analytes tested, reduced limits for chemicals such as total residual chlorine, and significantly reduced water withdrawal rates) why are these more stringent terms necessary if the plant is no longer operational? Is this due to changing regulatory requirements at the state level (e.g., TOGS) or is this due to a change in use at the plant?
 - o Why will limits be removed in the SPDES permit renewal for some outfalls (e.g. total residual chlorine limit for Outfall 01A, ammonia action level for Outfall 002, action level for molybdenum for Outfall 05A), but not other outfalls?
- If approved, how would these permits be impacted by a new site use? (e.g. a data center). Would those permits apply to the new site use? Or would the operators have to seek new or additional permits?

Thank you for your attention to this request 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 DEC completes its review of these permits.

Respectfully,



Grascen Shidemantle, PhD
Executive Director
Community Science Institute