



Seneca Lake **PURE WATERS** Association

Board of Directors:

President:

Jacob Welch – Himrod

VP - Water Quality:

Dan Corbett - Himrod

VP – Operations:

Frank DiOrio - Himrod

Treasurer:

Frank Case - Romulus

Secretary:

Peter Muller - Dundee

Rich Adams - Geneva

Richard Ahola - Dundee

Robert Barton - Hector

Thomas Burrall - Geneva

Kelly Coughlin – Geneva

John Cooley - Dundee

Peggy Focarino - Geneva

Sayre Fulkerson – Dundee

*Catharine McCracken -
Geneva*

*James McGinnis – Watkins
Glen*

Lawrence Martin - Dresden

William McAdoo – Geneva

William Roeger - Geneva

Robert Schrader - Himrod

John Socha – Himrod

Seneca Lake Pure Waters Association (SLPWA) is a 501(C)3 nonprofit environmental stewardship organization dedicated to protecting and preserving the quality of Seneca Lake and its greater watershed. It has a membership of over 700, comprised of property and business owners, farmers, fisherman, scientists, elected officials, and the general public – all united in the effort to keep Seneca Lake pure and supportive of its important uses – water supply, recreation, aesthetics, and as a centerpiece of community life.

SLPWA has recently become aware of Greenidge Generation LLC's petitions for declaratory rulings filed before the PSC for the sale/use of unmetered electrical power to expand the development of bitcoin mining by Greenidge Coin LLC at its Dresden facility in Yates County. SLPWA is concerned with this proposal and submits this comment for PSC consideration, a hearing to be held on June 11, 2020. SLPWA's request is simple. As is more particularly described below, we believe there are several unresolved thermal discharge issues relating to the facility's condenser cooling water discharge. That discharge empties into nearby Seneca Lake with little time nor space to cool. A declaratory ruling, lacking an extensive or at least some type of environmental review, lacks appropriate responsibility and would be violative of the high degree of trust given to the commission by the public at large, inclusive of those using Seneca Lake for business and recreational purposes. SLPWA urges the PSC to deny the petition for declaratory ruling. Rather, a complete application for Greenidge's Proposal should occur.

As the commission may know, Seneca, as well as most of the Finger Lakes, has been plagued over the last several years with the proliferation of harmful algal blooms (HABs). Such blooms pose widespread risks to fish, wildlife, waterfowl, humans, and their pets by the production of toxins harmful through contact or when ingested. Moreover, Seneca Lake has several public water supplies which use the lake water as a source. There are also many private homes which rely on the lake for household water supply. Such blooms are on a steady rise and have been correlated with rising water temperatures. More particularly, SLPWA's volunteer observers have identified many bloom events occurring directly in the flow paths of the Dresden facility discharge. These events have been reported to the NYSDEC and may be found on their HABs website.

The Greenidge Generation facility's thermal discharge is governed by a NYSDEC issued SPDES discharge permit. It was amended in October 2019 to allow the facility to utilize natural gas as a fuel. NYSDEC also issued a schedule of compliance for several ongoing discharge related issues at the facility. This included compliance with the federal EPA regulations regarding thermal discharges and related pumping/intake equipment. As further support for our position in this matter, the permit amendment

required a discharge plan evaluation study to be conducted by Greenidge. This was because the transport of discharge components, inclusive of thermal heat has been an issue for the nearby lake. There were also deadlines for implementation of self-contained cooling units that minimize or even eliminate warming of lake waters while still allowing high degrees of power generation to occur. This significant environmental concern by the DEC existed even before Greenidge's plan to increase power sales to its "tenant" Greenidge Coin, LLC.

At the very minimum, we would urge the commission to delay action on the requested declaratory ruling until it can confer formally with NYSDEC. That state agency should be consulted regarding the current level of compliance with the evaluations and schedules established in the DEC permit. There may also be SPDES issue with the now intended use of the facility for bitcoin mining, the initial SPDES application being based on providing public power to the grid. In fact, the pre-intended purpose of the facilities bitcoin business may justify a complete new look by NYSDEC as to the governing permit language, it's regulatory schedules, and the current compliance by Greenwich. The compelling issues of harmful algal blooms on Seneca Lake would/should prioritize such a review. As the intended use of the facility has changed so too a reevaluation of that change by NYSDEC should occur before any grant and certainly not pursuant to a declaratory ruling.

Finally, it squarely flies in the face of public trust for Greenidge Generation to (1) obtain a highly favorable SPDES permit allowing almost 140,000,000 gallons of lake waters to be warmed per day, based significantly on the need for public power and then (2) turning around and privately using that latitude to mine bitcoins via Greenidge Coin, LLC—a business entity with almost the same name and assuredly connected to itself financially. The outcry as to what is occurring, voiced by various concerned sectors, demonstrates that others can see through Greenwich's legal machinations. The commission, watching over what is the public's best interest should not be so easily fooled, thus requiring a closer look. That is all we are asking, a closer environmental look with other alternatives being examined, this piling in comparison to the public harm arising for no other reason than to line the pocket of one private enterprise.

Respectfully submitted,

Jacob Welch
President,
Seneca Lake Pure Waters Association

Contact Kaitlin Fello for questions or comments
Kaitlin@SenecaLake.org