



RIVERKEEPER.

August 14, 2009

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE,
Washington, D.C. 20426

Via: FERC E-filing and U.S. Mail

Re: Riverbank Application, Verplanck Pumped Storage Project No. 13358-000

Dear Ms. Bose:

Please accept the following as Riverkeeper Inc.'s ("Riverkeeper")¹ comments on the proposed Verplanck Pumped Storage Project No. 13358-000 ("Proposed Project"). Please also consider this letter a formal request for status as an "intervenor" and please notify us and provide additional information as to all filed documents and notices as they become available.

Riverkeeper is a member-supported, not-for-profit organization, dedicated to protecting the Hudson River and its tributaries, and to safeguarding the drinking water supply for New York City. Since 1966, Riverkeeper has used litigation, science, advocacy, and public education to end pollution, restore ecological health, and revitalize waterfront use and access.

Due to Riverkeeper's historic environmental and legal involvement with the Hudson River and its shores, and the nature of this Proposed Project, (a proposal for the construction of an electrical generating facility using new technologies, adjacent to the Hudson River and in close proximity to residential communities) we have a strong interest in seeing that the Proposed Project is evaluated with proper attention to all relevant factors. We urge all involved and interested agencies, as well as elected officials and the public, to scrutinize this proposal carefully pursuant to all applicable laws and environmental considerations. Moreover, if this facility is ultimately built, it must be done so in the most environmentally sound manner possible.

As delineated in Scenic Hudson's comments on this project, dated August 14, 2009,² this project presents a variety of potential environmental impacts due to construction and operation. Impacts of particular concern to Riverkeeper include, but may not be limited to, impacts to the Hudson River and its water quality, impacts to the community, and cumulative impacts due to other

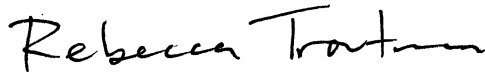
² Correspondence to Ms. Kimberly D. Bose and Mr. Nathaniel Davis, Federal Regulatory Energy Commission, from Mr. Jeff Anzevino, Scenic Hudson, Inc., dated August 14, 2009.

facilities in the area. We urge that these impacts be fully identified, evaluated and, if the project is built, prevented or mitigated.

Additionally, while we applaud innovation leading towards properly sited, safe sources of renewable energy, and are supportive of both state and national efforts to bolster our energy resources with the best, most environmentally sound facilities, as noted in the recently released draft "2009 State Energy Plan," one of the State's goals is the reduction of electricity use by 15 percent below 2015 forecasts.³ Thus, the relationship between the energy use of the Proposed Project and its anticipated output should be clearly set forth and analyzed.

Thank you for your attention and consideration. Please contact me at (914) 478 - 4501, x241 or at rtroutman@riverkeeper.org if you have any questions or comments.

Sincerely,

 ^{RC}

Rebecca Troutman
Senior Counsel

³ State Energy Planning Board, Governor David A. Paterson, State of New York, August 2009, xii.