



For a thriving New England

CLF Massachusetts 62 Summer Street  
Boston MA 02110  
P: 617.350.0990  
F: 617.350.4030  
www.clf.org

September 23, 2013

**VIA MAIL AND EMAIL**

James E. Belsky  
BWP Permit Chief  
Massachusetts Department of Environmental Protection  
Northeast Regional Office  
205B Lowell Street  
Wilmington, MA 01887

**RE: Salem Harbor Redevelopment Project, Transmittal No. X254064,  
Application No. NE-12-022**

Dear Mr. Belsky:

I am writing with respect to the notice of public hearing and offer for public comment issued on September 9, 2013 regarding the proposed plan approval, draft prevention of significant deterioration permit and notice of Section 61 findings for Footprint Power Salem Harbor Development LP's proposed construction and operation of a combined cycle electric generating facility at 24 Fort Avenue, Salem, Massachusetts.

According to the public notice, the Department will hold a public hearing on October 10, 2013 and will accept public comment through October 11, 2013 at 5:00 p.m. The project proposed by Footprint Power has been the subject of intense interest and concern by residents of the Salem area, surrounding communities, and other residents of Massachusetts. In addition, the proposed facility is located near environmental justice neighborhoods.

The draft plan approval and draft prevention of significant deterioration permit are based upon an application that has been supplemented through multiple amendments as recently as September 9, 2013. These application materials contain, *inter alia*, complex, detailed analyses of air dispersion modeling, projected emissions calculations from the facility, and other information which require CLF to engage an expert to develop public comment.



Due to the importance of public participation in the review of these draft permits and the complexity of the review required, CLF respectfully requests that the Department provide the public with a 60 day period from September 9, 2013, to provide public comment and move the public hearing date to the end of that 60 day period to facilitate the public's opportunity to meaningfully participate in this permitting review.

Respectfully submitted,

Shanna Cleveland  
Senior Attorney  
617-850-1716  
scleveland@clf.org

cc: Susan Ruch