

TALKING POINTS FOR HEARING ON POWER PLANTS/ENERGY

New York Power Authority

The New York Power Authority (NYPA) has plans to build 11 small power plants in 7 sites to meet the summer energy needs. The plants will use turbines that run on natural gas, each produce 47 megawatts of power, and have 107-foot stacks. The sites for the plants are:

- Harlem River Yards, South Bronx – 2 turbines
- Hell Gate, South Bronx – 2 turbines
- Long Island City, Queens – 2 turbines
- Sunset Park, Brooklyn – 2 turbines
- Williamsburg, Brooklyn – 1 turbine
- Brentwood, Long Island – 1 turbine
- Staten Island – 1 turbine

Lack of Public Process

The public process was inadequate and designed to ensure that few members of the public would be able to participate. The proposal's notice was given on the day before Thanksgiving and comments are due the Friday before Christmas. The 3 public hearings for the Bronx, Queens, and Brooklyn are being held on the same date at the same time in 3 different locations, making it impossible for the public to attend all 3 hearings. The hearings were not all located in the impacted neighborhoods. The notice for the Brooklyn hearing gave an incorrect location for the hearing (PS 8 rather than PS88). The EAF was not easily accessible and NYPA files were not available prior to this hearing.

Do We Need These Power Plants?

The power plants are supposedly needed to meet the energy needs during the hottest days of the summer. But, NYPA has not attempted to show that they actually need these plants at all. Before new power plants are built, NYPA should study the need for new plants.

For example, NYPA publicly claims NYC needs 300 additional megawatts of supply to avoid "blackouts" in summer 2001. NYPA has misled New Yorkers by failing to mention the 24-26% **reserve** electricity supply New York currently enjoys. According to the NRDC, NYPA also failed to include **an additional 275 megawatts** of electricity anticipated by summer 2001 (175 MW from the Orion Unit 2 in Queens, 70 MW from the Linden Cogeneration Plant and 30 MW from Orion's Gowanus Gas Turbine). Furthermore, NYPA failed to include **an additional 271 megawatts saved through energy efficiency/demand reduction programs** run by the NYS Energy Research Development Authority (NYSERDA). If any additional peak energy supply is necessary, non-polluting or less polluting alternatives should be investigated, such as conservation and alternative energy sources.

Potential Environmental Impacts

NYPA has determined that there will be no significant impact on the community or the environment and so, will not do a full environmental impact statement ("EIS"). But, they will study the impact of the proposed plant in Staten Island.

The environmental review (called the environmental assessment form or "EAF") was inadequate. **The EAF did not fully study the effects on noise, air quality, water quality, land use, community character, or environmental justice. Many of the sites are within 400 feet of residences, parks and schools.** The New York City sites are all in low-income communities of color.

There was no cumulative impact analysis performed. The EAF did not consider the impact of NYPA's plants along with the impacts from other large power plants proposed for the same communities or the multiple pollution sources already located in these heavily impacted neighborhoods.

The turbines will add new air pollution emissions to already polluted neighborhoods. The asthma hospitalization rates in these areas are among the highest in the U.S (up to nine times the national average). The EAF did not

thoroughly evaluate the potential impact of increased fine particulate emissions. The EAF did not require NYPA to offset the increased air pollution emissions. **(See detailed comments below)**

The NYS State Assembly should demand:

- 1) A full environmental impact statement (EIS), including evaluation of potential measures to offset the environmental impacts of the proposal;**
- 2) An environmental justice analysis detailing cumulative impacts, socio-economic data and health statistics;**
- 3) The public be given a meaningful opportunity to review the proposal and comment; and**
- 4) NYS State agencies initiate an energy needs planning process that studies whether there is a need for new power plants (CURE's platform .**

GENERAL:

Fine Particulates (PM 2.5) –

The Department of Environmental Conservation (DEC) and the Department of Public Service (DPS) have taken the position that assessment of the impacts of power plants on local communities should not consider the emissions of fine particulates. All the public health information on the exposure to fine particulates conclude that there will be an increased risks of asthma and upper respiratory illness incidents - which DEC and DOH do not disagree.

DEC AND DPS'S OPPOSITION TO EVEN CONSIDER FINE PARTICULATES EMISSIONS IN EVALUATING IMPACT OF POWER PLANT PROPOSALS IS INTENDED TO MAKE IT EASIER TO SITE POWER PLANTS, AND TO BENEFIT POWER PLANT COMPANYIES AT THE COST OF PUBLIC HEALTH. DEC AND DEC MUST BE REQUIRED TO EVALUATE THE EMISSIONS OF FINE PARTICULATES (P.M. 2.5) IN ASSESSING THE IMPACTS OF PROPOSED POWER PLANTS.

Public Health Impacts

The Department of Environmental Conservation and Department of Public Service have taken the position that the current levels of disease in residents – especially asthma suffers – and other residents that are susceptible to the exposure to fine particulates – such as the elderly, and children - that are impacted by proposed power plants should not be considered in evaluating the impacts of power plant proposals

DEC AND DPS MUST BE REQUIRED TO CONSIDER THE HEALTH INFORMATION OF RESIDENTS THAT WILL BE EXPOSED TO POLLUTION FROM PROPOSED POWER PLANTS - UNLESS THEY ARE REQUIRED TO DO SO, THE RESIDENTS WHO ARE AT MOST RISKS FROM THE POLLUTION FROM PROPOSED POWER PLANTS WILL BE IGNORED IN FAVOR OF EXPEDITED THE SITING OF POWER PLANTS.

Environmental Justice

Despite power plants being proposed in minority and low-income neighborhoods in New York City, the Department of Public Service takes the position that environmental justice analysis is not permissible in Article X proceedings. The Department of Environmental Conservation takes the position that environmental justice need not require looking at alternative sites that avoid impacts on minority and low-income neighborhoods. The New York Power Authority refuses to provide information on how it selected sites and performed environmental justice analysis.

An environmental justice analysis must be performed in all power plant proposals that, at a minimum includes:

- an assessment of the impact and percentage of minority and low-income residents impacted by the proposed power plant;
- the assessment of impact must include fine particulates (PM 2.5) and the health information of impacted community; and
- impacted community must be compared against other communities adjacent to other potential sites to determine whether the proposed power plant will result in disproportionate and adverse impacts to low-income and minority populations.

Alternative Pollution Control Technology

In order to control the emissions of nitrogen oxide, DEC refuses to consider an alternative to control technology that it currently allows power plants to use known as Selective Catalytic Reduction (SCR). This technology uses ammonia which leaks into the air and results in additional particulates being formed in the atmosphere – this is known as secondary formation – DEC does not require that these particulates be included in its assessment of the impacts of power plant proposals. DEC refuses to require alternative technologies that avoid these impacts.

DEC AND DPS MUST REQUIRE TO EVALUATE THE ADDITIONAL PARTICULATE IMPACTS ASSOCIATED WITH THE USE OF SCR

DEC and DPS must require all power plant proposal to examine the use of alternative pollution control technologies that avoid secondary particulate formation such as a technology known as SCONOx. SCONOx has been determined to be effective on power plants by regulatory agencies in other states such as California