

Public Comment on the Cricket Valley Energy DEIS
Constance I. DuHamel
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Thank you Willie Janeway, your colleagues at NYS DEC Region 3, and members of the Cricket Valley Energy team for coming together for the purpose of soliciting comment on the DEIS for the proposed project, Cricket Valley Energy.

Thank you, Willie, for announcing today your accommodation for a Saturday session to be incorporated into the SEQRA process on Cricket Valley, and to be scheduled by the Dover Town Board. Thank you, Supervisor Courtien, for requesting a Saturday session. This additional session will give voice to the people of Dover and the Harlem Valley, that they may understand and comment on the negative public health issues surrounding Cricket Valley, most notably with regard to air quality.

I am indebted to Tonia Shoumatoff for her continuing coverage of Cricket Valley Energy for The Millbrook Independent, and appreciate that from a regional perspective, a new gas-fired plant such as Cricket Valley is preferable to a new coal-fired plant, and that the carbon offset credits can be sold to older coal-fired plants to decommission them. For this area, however, the alternative of a coal-fired plant is not the correct comparison: a coal-fired plant would never be built in the Harlem Valley, nor, in my opinion, is it likely that taking off-line the coal-fired plant Danskammer Plant across the Hudson from Wappinger's Falls will have a positive affect on our air quality, most of which contains pollutants from industrial production in northern New Jersey.

For Harlem Valley and Litchfield County residents however, overall emissions reduction across the rest of New York State is not the immediate public health issue; the issue for our region is how much more polluted the air will be in eastern Dutchess, western Connecticut and the Berkshires, with the Cricket Valley Energy 1000 megawatt power plant coming on line. From that perspective, how does NYS plan to monitor the negative impact on the health of the children at the Dover Middle/High School? Additionally, the measure of the impact of the proposed 1000 megawatt power plant on our region should be cumulative, taking into consideration the relatively poor air quality we are reported to have already, and the extent to which emissions will hang in the air in our valley.

Cricket Valley has agreed not to exceed EPA thresholds for the harmful chemicals in the emissions, and we expect NYS to request these thresholds reflect the cumulative impact of these emissions combined with the pollution levels that already exist in air in the Harlem Valley. We expect that the NYS DEC has in mind those on the front line, our children, exposed day after day to these emissions while engaging in outdoor sports just over a mile upwind from the plant.

With our children in mind, I propose that an air quality monitoring station be sited here, on the campus of the Dover Middle & High Schools, with the data collected by the Cary Institute of Ecosystem Studies, and submitted to the EPA. The residents of the Harlem Valley should not have to rely on the industry practice of self-monitoring, when our

children's health is at stake and the industry has objectives often at odds with our own. The monitoring of asbestos removal takes place out of Kingston, downwind from the project, because that was the closest monitoring station equipped to collect that data. Does that make sense to anyone here? My father died of pulmonary fibrosis. His pulmonologist, Dr. Edsel of Columbia Presbyterian, said when the World Trade Center was built, asbestos fibers were found as far north as Boston. It is in that direction the prevailing winds blow, and we want our monitoring stations in the way of the prevailing winds, when they blow.

And when they don't, we will know exactly how much more is accumulating in the Harlem Valley, and breathed in by our children, as they continue to engage in outdoor activities, including practice and games for team sports.

Recommendations:

That The Town of Dover retain an independent air quality expert to review the DEIS on our behalf.

The fees will be paid by Cricket Valley Energy in much the same way AKRF's services were paid by Dover Knolls. After reading the Air Quality section of the DEIS, it is clear an industry expert is required to vet this project on the town's behalf: To that end, I recommend Camp, Dresser & McKee, now CDM, to check the data, analysis and conclusions in the CVE DEIS. The hydrogeologist hired by the Coalition for the Responsible Growth of Dover found enough errors in the data, analysis and conclusions from the Dover Knolls pump tests, as presented in the Dover Knolls DEIS, that DEC suggested the Town of Dover and AKRF, the Town Board's planner, incorporate our report in their analysis of the Dover Knolls DEIS.

That Cricket Valley Energy provide for and initially fund the operation of an asthma clinic for the people of the Harlem Valley.

That Cricket Valley Energy fund a scholarship program open to all qualifying graduating seniors of the Dover High School.

While one has been proposed for students to study engineering at the college level, this program should be open to all graduating seniors, and for any area of study, whether it be at the trade level or the college level, and for a variety of areas of study. Funds for the scholarships should be endowed up front, and be administered during the useful life of the project, estimated to be 40 years. They might be called "The Useful Life Scholarships," for all our children should have useful lives, and all will be negatively impacted by the pollutants introduced to Dover, not just those higher achieving students who are directed towards engineering.

That the decommissioning of the Cricket Valley Energy facility includes removal of project-specific construction.

If not, Dover will be faced with another "eyesore" to be retrofitted into our character and fiscal condition 40 years from now.

That the Great Swamp and the fens of the Harlem Valley be considered as Class 1 properties as defined in the Cricket Valley Energy DEIS.

The National Park Service owns lands within a 100 km radius (the Appalachian Trail crosses through the Great Swamp in Pawling,) federal funding from US Fish and Wildlife were procured to assist in purchasing the Slocum-Mostachetti Preserve in the Great Swamp, and of the 100 or so fens in New York State, roughly 80% of them are in the Harlem Valley.

As Class 1 look-alikes, Cricket Valley Energy would monitor their unique ecosystems, not necessarily before construction begins, but certainly during the three years during construction and before the project is up and running. There are many research sites already in place in the Harlem Valley, and Cricket Valley could partner with them in their studies, thereby reducing the costs of initiating a research project.

In closing, I wish to thank all of you for your time, and thank Matt Martin of Cricket Valley Energy for arranging for the recording of today's sessions. As I understand it, the sessions will be available to the public on Dover TV and at CricketValley.com. Once again, thank you very much for permitting the Town of Dover to schedule a Saturday SEQRA session on the Cricket Valley DEIS.

Thank you,

Stancy DuHamel

Wingdale, NY