



Cayuga Lake Watershed Network

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It takes a Network to protect a watershed!

Hon. Jeffrey C. Cohen, Acting Secretary

Department of Public Service

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<http://documents.dps.ny.gov/public/Comments/PublicComments.aspx?MatterCaseNo=12-e-0577>

August 16, 2013

Dear Secretary Cohen:

Thank you for this opportunity to comment on 12-02829/12-E-0577, "Proceeding on Motion of the Commission to Examine Repowering Alternatives to Utility Transmission Reinforcements," regarding the Cayuga Generating Facility, located on the east shore of Cayuga Lake in Lansing NY.

Founded in the mid-1990s, the Cayuga Lake Watershed Network is a nonprofit organization with an active Board of Directors and membership of 500. The Network is focused on education, research and protection of our lake and the creeks that drain to it. Our mission statement: "The Cayuga Lake Watershed Network identifies key threats to Cayuga Lake and its watershed, and it advocates for solutions that support a healthy environment and vibrant communities."

The Cayuga Lake Watershed Network's 2012 position on gas drilling and fracking states that shale gas dependency and development would forestall the growth of the renewable energy sector that offers to bolster our economic vitality and curtail greenhouse gas emissions. We support an energy policy that promotes conservation and renewable energy sources.

1. Water quality concerns

An important part of a forward-looking energy policy is the protection of our water resources, specifically Cayuga Lake and the waters that drain to it. A worrisome legacy at the Cayuga Generating Facility (formerly AES-Cayuga) is the coal waste combustion landfill on site and its impacts to adjacent groundwater and lake water quality.

According to records kept by AES Cayuga, L.L.C (see: Conceptual Closure Plan, Cayuga Ash Disposal Facility, Fagan Engineers, September 2002; and Groundwater Contingency Monitoring Results as reported to AES Cayuga by AMEC on dates including November 12, 2010; records examined by the Network in January 2011), monitoring results from numerous groundwater monitoring wells installed downslope of the landfill revealed sulfates, barium, selenium, boron, ammonia, and sodium at levels above potable water standards for groundwater.

Also according to AMEC's November 12, 2010 report, leachate from an on-site retention pond was found to be leaking into the soil adjacent to and underneath the pond. While this leak was repaired in 2010, the report indicated that the adjacent groundwater monitoring well test results during 2009 and 2010 included calcium, potassium, magnesium, sodium, sulfate and TDS "outside of historical ranges." The report suggests that these elevated measures may persist.

Additionally, at two surface water sediment sampling points along a stream which discharges to Cayuga Lake downslope of and to the south of the landfill, 2010 test results by AMEC indicated elevated levels of chromium and zinc (AES Cayuga Contingency Monitoring Summary 2010, 3rd quarter).

A 2010 report from EarthJustice, Inc., states that "Contaminated leachate and runoff from an onsite coal combustion waste landfill discharged directly from a pond into Cayuga Lake. The contaminated discharge contained grossly elevated levels of arsenic, cadmium and selenium. In addition, a partially unlined landfill contaminated groundwater and residential wells with elevated levels of lead." (Environmental Integrity Project, Earthjustice, *et al.* In Harm's Way: Lack of Federal Coal Ash Regulations Endangers Americans and Their Environment, August 2010 at pp. 112-118).

We urge that, prior to any decisions being made about future uses of the AES/Cayuga property, any and all groundwater, surface water and drinking well water problems must be fully assessed and mitigated. This landfill represents a neglected environmental and economic cost of coal combustion that has been building for more than 50 years. It must now be addressed.

2. Looking beyond natural gas

Repowering the Cayuga Power Plant to burn natural gas is inconsistent with the Cayuga Lake Watershed Network's position that hydraulic fracturing of natural gas poses serious threats to the clean waters of the Cayuga Lake Watershed, as well as our rural lands and agrarian livelihoods (Cayuga Lake Watershed Network, 2012.

Position Statement on Hydraulic Hydrofracturing

http://www.cayugalake.org/files/all/clwn_position_statement_on_hydraulic_hydrofracturing_may_2012.pdf)

Further deepening our investment in natural gas will aggravate climate change when we urgently need to curtail greenhouse gas emissions. And repowering with natural gas would have a large monetary cost - as much as half a billion dollars - in a counterproductive and unnecessary energy infrastructure. This is money that can be invested in development of a robust renewable energy sector.

Options outside the two offered by the PSC should be given consideration. The current repowering option is restricted to natural gas. In addition to renewables, waste-to-energy and other alternative technologies may deserve consideration. Waste-to-energy offers the intriguing advantages of a more responsible method of processing waste that would have the financial and environmental benefits of payment for fuel use ("tipping fees") and curtailing landfill development.

Another interesting suggestion that addresses the issue of energy storage and reliability is a "pumped hydropower facility" - water could be pumped by renewable energy sources into a reservoir that could then produce hydropower when needed. This is crucial decision that merits a full evaluation of options and a vision to the future.

Another option is wood biomass as a fuel. Wood prepared for combustion in a plant has an energy density higher than waste and close to coal (22 gigajoules per metric tonne versus 25 for coal, depending on the source). With appropriate measures a sustainable regional supply chain could be developed using agroforestry to grow the wood and deliver it by rail to Cayuga. This would create and maintain jobs not only at the plant but also in the hinterland with the growing and processing of the wood.

Our point here is that there are creative, forward-looking, sustainable and renewable energy alternatives to natural gas that have not been considered. We ask that the PSC look beyond the two options it is presently mandating, i.e., to either repower with natural gas or to retire the plant.

3. We support the Lansing community

Our mission statement directs us to look beyond immediate water quality issues to the wider context of community health, calling on the Network to advocate “for solutions that support a healthy environment and vibrant communities.” Thus we support an outcome that can protect the lake, points to a post-fossil fuel energy future for the region, and helps the Town of Lansing maintain and grow its revenue and services for its residents.

We urge that Governor Cuomo and other government leaders take action to buffer the local job and tax losses that would come with closing of the Cayuga Power Plant. Opportunities for workforce training and local funding are available through NYSERDA's Energy, Education, and Workforce Development programs, the Southern Tier Regional Economic Development Council, and from the Regional Greenhouse Gas Initiative. The transition poses immediate challenges for the Lansing community with the closing of the plant, but development of a renewable energy sector ultimately offers on the order of three times the job opportunities compared to fossil fuels per dollar invested (Pollin, R. 2012. *Back to Full Employment*. MIT Press. Cambridge, MA).

We urge our elected leaders to provide the training and financial support to assist Lansing through this crucial transition to a better energy future for all.

4. We support the NYSEG proposal to upgrade the electrical transmission system

We support the NYSEG proposal to upgrade the electrical transmission system as the most cost-effective and responsible option. NYSEG has determined that the transmission upgrade alone is sufficient to provide the needed energy and cost estimates are about one-fifth the cost of repowering proposals. Strengthening New York's electrical transmission grid is called for in the Energy Highway Blueprint as necessary to enabling efficient energy distribution. Upgrading the transmission system will build a foundation for a timely transition to renewable sources of energy.

Thank you very much for this opportunity to comment on this important issue.

Sincerely yours,

Hilary Lambert

Dr. Hilary Lambert, Steward/Executive Director

Comments submitted on behalf of
The Board of Directors, Cayuga Lake Watershed Network