



PO Box 25, Goshen, NY 10924

### Testimony on the Danskammer Proposal

Presented to the record by Michael R. Edelstein, Ph.D.

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Dear ALJs,

I am the President Emeritus of Orange Environment, Inc. whom I represent today. Since 1982, OE's Mission has been to Protect the ecological integrity of the OC region and promote the sustainability of its communities. I am also a Climate Reality leader.

Professionally, I am an Environmental Psychologist who has studied contaminated communities for more than forty years, detailing the continuing significant adverse psycho-social impacts on communities and residents affected by such facilities across the US and globally in such books as Contaminated Communities, soon to have a third edition. And I am a college professor teaching sustainability.

Over the years, OE has been deeply involved in opposing gas fired power plants. In the 1990s, we were a key intervener in the administrative review of the Calpine Plant proposal. We took the lead during the review of the CPV plant in New Hampton, which was permitted during a corrupted review despite our efforts.

CPV looms over the surrounding community, threatening the air quality and thus health of the nearby city of Middletown, with its significant EJ populations, and a wide swath of southern Orange County. There have already been adverse health impacts and significant life disturbance, particularly when the diesel fuel backup

was used. OE has filed to intervene against issuance of the long overdue Title V Air Permit for CPV. The DEC has yet to make a decision on that permit, allowing the plant to operate in the meantime under a loophole, illustrating the dilemma regulators face when a plant has been constructed when it should not have.

Similarly, the proposed Danskammer plant will threaten adverse community impacts. Given the proximity of the City of Newburgh and other communities with significant EJ communities, it is certain that significant adverse impacts will be disproportionate for these populations.

Moreover, this project is in direct violation of the NYS Climate Leadership and Community Protection Act, targeting an 85% reduction in GHG emissions by 2050, 100% zero-emission electricity by 2040 and 70% renewable energy by 2030. NYS has rejected fracking and fracked gas should not be imported. New investment needs to be directed toward reaching these goals, not confounding it. The best utilization of the site and replacement of jobs lost to the community is a renewable energy project such as the battery storage project that has been suggested.

Back in the 90s, one could rationalize a gas fired power plant as a step forward from coal and nuclear power, but no more. At this juncture, given the legacy of fracking and climate, to build a gas fired power plant is a step backwards in our desperate struggle to decarbonize in a few decades, as we must do in light of recent attention on methane reduction as the fastest way to drop GHG levels. The IPCC's recent AR-6 report makes clear that we have crossed the red line. The Climate Crisis is here now, not a future concern. Rapid decarbonization is a challenge that I am deeply involved with. That will take all of our expertise, resources and attention. We need to only take steps forward and no steps back.

To our friends in labor who speak for this project, I want to say that there is much rebuilding to do to shift to a renewable energy basis and create climate resilient infrastructure. Building the wrong project may provide jobs for today but long-term misery. Put your talents to the transformation we must make.

This permit should be denied because it is the wrong project for our time. It will create significant adverse community, EJ and health impacts as well as significant climate impact. It would be a violation of fiduciary responsibility to permit this facility.

An administrative hearing should be held if a permit is contemplated to review the many substantive issues. Please consider OE as a potential party to any issues hearing.