

STATEMENT BY ROD VANDIVERT, EXECUTIVE DIRECTOR,
SCENIC HUDSON PRESERVATION CONFERENCE, AT THE
PUBLIC HEARING TO CONSIDER THE APPLICATION OF
CON EDISON FOR A PERMIT TO CONSTRUCT A THIRD
NUCLEAR POWER PLANT AT INDIAN POINT, BUCHANAN,
NEW YORK, ON FRIDAY, MAY 2, 1969. MR. SAMUEL
E. JENSCH, CHIEF HEARING EXAMINER.

Mr. Examiner:

I am Rod Vandivert, here today representing Scenic Hudson Preservation Conference. Our concern in this matter is for the total ecological balance of the River as an important environmental resource. In recent years thermal pollution has become a national concern. Unfortunately, at present, there is more concern than working knowledge regarding that which some call thermal pollution and others rather blandly call thermal enrichment.

The greatest thrust in the evidence produced by the utility industry to date has been based upon a most optimistic view. Very little has been said about possible cumulative effects of a multitude of industrial plants emitting heated effluents. Even less has been said about the long term effect of heat in the encouragement of pollutants. The Hudson is now being "cleaned" at a tremendous expense. Many authorities and officials are encouraged by progress and are forecasting a pure and usable river at various dates in the 1970's. Officially, 1972 is a target date. Realistically, the mid or late 70's will see great improvement unless, of course, a new pollution and a new pollutant are introduced.

I respectfully submit that a continuing discharge of volumes of heated effluents from the utility plants now proposed at various points along the Hudson can well be a critical factor. I would suggest further that the concentration of plant sitings suggested by Con Edison (which has just announced nuclear plant #4 just south of Indian Point) is simply bad planning. If the panacea of nuclear power creates any long term thermal problems the location of three or four or possibly even more plants tightly clustered may well create an irrevocable

environmental damage, as have other of our great achievements. DDT, the saviour of man in the 40's, is now one of the greatest problems of the 70's. A clear warning regarding some of the future benefits of thermal enrichment exists less than 50 miles from Indian Point #3 in the southwest corner of the Hempstead wetlands. In the area from Broseware Bay to Garrett Lead a few miles east, water quality has steadily been degraded by the combination of the effluents from three sewer plants and the heat from the Long Island Lighting Company Barrett plant, a conventional steam generating plant in Island Park. According to local and state authorities, a relatively low heat has stimulated the action of bacteria and other microorganisms fertilized by treated effluents to the point that the water quality standards set 5 years ago mean nothing and will continue to mean nothing until the utility and the three local towns and villages change their techniques of discharging their various effluents. For the first time in 300 years highly productive shell fishing areas have been closed permanently. Whatever economic benefits existed within that marine environment have been sorely diminished. Neither the utilities' experts nor those scientists responsible for local water quality anticipated this problem. Yet it exists and may well be the warning necessary to mandate a closer examination of the marine environment affected by the outfall of utilities using rivers, estuaries, and lakes for cooling water.

Scenic Hudson does not oppose, at this time, nuclear power as such. It does, however, wish to express great concern over present plant siting practises based upon inadequate knowledge of thermal pollution. We can not accept the industrial criterion whether it be in the form of the "fish like hot water" kind of platitude or it be the result of incomplete research based upon single species survival. Nor can we accept as definitive information, model studies no matter how handsomely or expensively done. Model studies or single species research can be used as indicators but until utility experience can show

the long term effect or lack of long term effect on comparable bodies of water, any proliferation of plants in a single area is inviting either an economic or an environmental problem of great magnitude. If it were proven within the next five years or so that the volume of water used by Indian Point #1, 2 & 3 (and whatever plants may follow in the area) were damaging to the river as a resource specifically what could be done with the thermal effluent?

As the development projected for the River continues and research and experience on its effect on marine environment develops, it may be necessary to change standards. There must be sufficient flexibility in the design of the plants now being proposed to accept rigidly tightened standards if they prove necessary. It is entirely within technological skill to achieve close circuitry to protect the marine life and since marine life is not a matter of a single species survival but a matter of balance of a desirable marine populus it is critical to have complete control of thermal effect. Con Ed has stated quite clearly that it regards cooling towers impossible within this area. They say that the volume of water necessary for cooling could completely change the atmosphere in the area of Indian Point. If this is an accurate appraisal it would seem to be extremely shortsighted to allow further development under present conditions of marine research and technology.

The River has survived the economics and short term planning of the past. It has not, however, been improved by them. One of the controlling questions in consideration of the project now before this body must be its long range effect on the river as a resource. And at this stage "best estimates" can not be accepted. Definitive and complete information must be a prerequisite.