



Sierra Club Woods & Wetlands Group

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Vernon Hills, IL 60061 **CLERK'S OFFICE**
November 6, 2000 NOV 08 2000

STATE OF ILLINOIS
Pollution Control Board

Dorothy Gunn, Clerk
Illinois Pollution Control Board
100 W. Randolph St.
Suite 11-500
Chicago, IL 60601

Docket R01-10

P.c. #169

Please accept these comments as a supplement to those submitted by Jack Darin on behalf of the IL Sierra Club Chapter. The Woods & Wetlands Group represents 2000 of the IL members, and has been at the epicenter of the peaker plant problem. We are concerned by the damage new power plants will do to our environment. We are also distressed that our state government has not done more to help us better understand and respond to the number, performance, and location of new power plants. Please consider these points:

- The present reliance on local citizens to be experts is extremely taxing. Hearings in Libertyville went on for 10 months, 2 per month, 4 hours each! It wore us out! We need more help protecting our environment, and we expect more from our IEPA.
- Frivolous applications. They're all the same. They are usually incomplete. They are all recommended by IEPA for approval. The tenor at IEPA hearings is: approve it now, and adjust the numbers later. This betrays the spirit of the hearing and the good faith of the citizens. Shell and puppet owners should not be accepted.
- Loopholes replacing loopholes. We've suffered from Grandfathered Coal. And then the NOx Waiver. Those should stop. They should not be replaced by a new loophole: synthetic minors. Please end manipulation of our environmental laws!
- False Choice: Peakers are compared to coal as cleaner, but we're being asked to accept peakers AND coal plants. Neither should be justified by comparison to the other unless one truly replaces the other. The grid, and the lack of an energy policy, make this untrue.
- The Power Pyramid. New plants are not needed until other measures have been exploited: Conserve, then Cogeneration on existing plants, then Renewable Energy, then, last of all fossil plants. The order has been reversed. Expectations should be placed on new sources to significantly support the more effective measures in exchange for the privilege of polluting our environment.
- We need more comprehensive regulation of energy sources that considers the aggregate and various environmental burdens of each. This year it is peakers. Next year it will be microturbines, and even fuel cells after that. Please consider more general rules that will include the many impacts (noise, air, water, land) of these and other new sources in the near future.

Sincerely,

Evan L. Craig
Group Chair



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