

## Pragmatic Environmentalist of New York Summary Update March 6 - March 19, 2023

This is the latest summary update of my recent posts at [Pragmatic Environmentalist of New York](#). I have been writing about the pragmatic balance of the risks and benefits of environmental initiatives in New York since 2017. This summary describes each of my posts with minimal technical jargon. If you do not want to be on this mailing, list then let me know. Previous updates and a pdf copy of the following information are also [available](#).

There are only three posts this week. Not because I have not been working on things but because I have spent so much time evaluating and writing up things that do not directly relate to blog post articles at this time. Most of my time was spent working on New York's plans for a cap and invest program. That yielded two posts. The first provides background information related to one aspect of amendments to the proposed plan and the second addresses the latest legislative amendments to the plan.

### [Peaker Power Plant Considerations](#) March 18, 2023

The Hochul Administration and Progressives in the Legislature are placing what I think is dangerous emphasis on redressing historical and current disproportionate environmental impacts on disadvantaged communities. There is no question that it is appropriate to address this issue but it is important to understand what causes the harms and balance expectations and potential solutions.

The poster child for egregious harm is "hotspots" is fossil-fired peaking power plants. I believe the genesis of this contention is the arguments in [Dirty Energy, Big Money](#). This post consolidates information from all my previous posts on this topic. I show that the presumption of egregious harm is based on selective choice of metrics, poor understanding of air quality health impacts, unsubstantiated health impact analysis, and ignorance of air quality trends.

I maintain that the appropriate metric for determining the impact to human health and welfare is the National Ambient Air Quality Standard process. Using the linear no-threshold model approach in [Dirty Energy, Big Money](#) and the Scoping Plan is not an appropriate metric for permitting decisions related to peaking power plants. Appeasing activists who demand zero-risks ultimately means that no emissions will be allowed and that will shut down society.

The argument that peaking power plants affect neighborhoods as portrayed is flawed. The air pollutants that are alleged to be the cause of a significant health impacts in disadvantaged communities near peaking plants are the secondary pollutants ozone and PM<sub>2.5</sub>. Because it takes time for the conversion from precursor pollutants, they are unlikely to affect adjacent neighborhoods simply because they are blown downwind during the conversion phase.

Inhalable particulates (PM<sub>2.5</sub>) are frequently cited as the primary cause of health impacts but independent studies offer contrary results. The epidemiological data used by the Environmental Protection Agency have [never been independently reviewed](#) and another health impact [study](#) of all

deaths in California between the years 2000 to 2012 (more than 2 million) reported no correlation between PM<sub>2.5</sub> and death.

The biggest flaw in the argument is that activists argue that the health-related impacts are increasing while PM<sub>2.5</sub> concentrations in the atmosphere are decreasing. All the air quality trends are going down. If proponents can show that there have been substantial benefits associated with the observed concentration reductions in line with their projections for improvements then I might be more sympathetic to the arguments. I have not found those results.

#### [NY Climate Act Cap and Invest Plan Going Off the Rails](#) March 19, 2023

As part of New York's budget process Governor Kathy Hochul announced a "cap and invest" [plan to use a market-based program](#) to raise funds for [Climate Leadership & Community Protection Act](#) (Climate Act) implementation that is included in the Budget Bill. I have looked at the language for proposed amendments to the original Budget Bill proposal and am stunned at the disconnect between reality and the perceptions of the authors of the amendments.

The [legislative amendments](#) (Senate Bill 4008-B) to the Hochul Administration bill proposal are part of attempts to redress historical and current disproportionate environmental impacts on disadvantaged communities. There are four conditions in the cap and invest proposed laws or are in the Climate Act itself that will make the proposed cap and invest approach unworkable. The first is related to the peaker power plant issue described in the previous post. All cap and invest programs are intended to reduce emissions that have regional or global impacts. Trying to combine cap and invest global obligations with "hotspot" neighborhood air quality obligations already covered by other air quality rules would be difficult if not impossible to do without unintended consequences. The amendments proposed would prohibit allowance banking, but that eliminates a compliance mechanism widely used in all existing emission market programs. The amendments also include this: "Allowances shall not be tradable, saleable, exchangeable or otherwise transferable". Cap and invest is a variant of cap-and-trade emission market programs so eliminating those options is absurd. The Scoping Plan states that "offsets would have little, if any, role under a cap-and-invest program designed to comply with the Climate Act". Given that offsets are a necessary component for meeting the net-zero by 2050 target I expect that a different subsidy will be used to incentivize offsets if prohibited in the cap and invest program.

A primary component of New York's Climate Act and cap and invest legislation was to address climate justice. I do not dispute that is a reasonable goal but appeasement of the naïve and misguided demands of climate justice advocates regarding cap and invest components will make that program unworkable and cause reliability, affordability, and safety problems. When those problems occur, the communities that will be impacted the most will be the ones this mis-guided appeasement is intended to protect.

[Climate Act and the Broken Window Fallacy](#) March 15, 2023

A recent [post](#) at [Climate Discussion Nexus](#) does an excellent job refuting that idea the Climate Act will create significant economic activity. It always seemed counter-intuitive to me that all this economic activity that requires subsidies will be a net gain to the economy. This article explains the fallacies and I reprinted it in its entirety.

The article explains:

The whole Green New Deal, Just Transition, Energiewende and all its ignorant destructive cousins around the world miss this key insight. They are not proposals to make us better off, they are proposals to vandalise the economy then incur costs repairing it. They include the vandalism as a feature not a bug, and hope to get us back to where we were (though as we've made clear elsewhere we have grave doubts about the [enormous engineering obstacles](#) to generating enough power with wind and solar let alone distributing it) with the entire cost of the replacement a net loss.

I concluded that the Climate Act is an ignorant cousin in the Green New Deal, Just Transition, Energiewende family and they all not only want to destroy the existing energy system but they don't have a replacement that has any chance of working. The advocates who claim all these new jobs will provide economic opportunities should also, for example, include the costs to repair broken water pipes when the power goes out in the winter when there is no wind.