

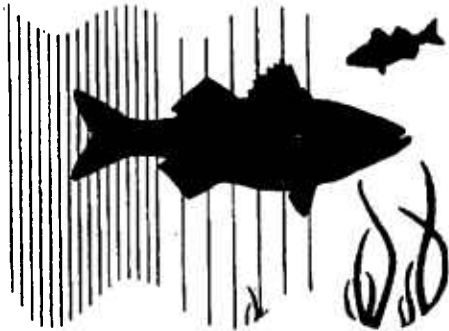


corresp

Rockland County Conservation Association, Inc.

FOUNDED 1930

P.O. Box 213, Pomona, New York 10970



PASSAIC RIVER COALITION

246 Madisonville Road, Basking Ridge, NJ 07920

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PUBLIC SERVICE COMMISSION
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28 August 2000

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C99-F1164
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MR. S. BLOW
MR. J. DE WAAL MMEFYI

Ms. Janet Hand Deixler
Secretary
State of New York Department of Public Service
Board on Electric Generation Siting and the Environment
3 Empire State Plaza
Albany, NY 12223-1350

Hon. Gerald L. Lynch
Presiding Examiner
New York State Department of Public Service
3 Empire State Plaza
Albany, NY 12223-1350

Hon. Kevin J. Casutto
Associate Examiner
New York State Department of Environmental Conservation
50 Wolf Road
Albany, NY 12233-1550

Re: Application of Southern Energy Bowline, LLC, Case #99-F-1164

Dear Ms. Deixler, Honorable Gerald L. Lynch, and Honorable Kevin J. Casutto:

Both the Rockland County Conservation Association and the Passaic River Coalition are active parties in the aforementioned case pending before the New York State Board on Electric Generation Siting and the Environment (Siting Board). Representatives of both organizations and many other citizens have been meeting and working together for the past several years in a

communal effort to protect the natural resources of Rockland County and the Passaic River Basin from further degradation, and to sustain the social and economic well being of the people of southeastern New York and northeastern New Jersey. These two organizations are jointly requesting "intervenor funding" to help "defray expenses for expert witnesses and consultant fees" as we participate in the hearings on the aforementioned case.¹

The Rockland County Conservation Association, founded in 1930, is a nonprofit, volunteer organization. It works with public and private agencies to establish and maintain sound environmental policies and procedures.

The Passaic River Coalition is a nonprofit watershed association that has been active for over thirty years in protecting the water resources of the Passaic River Basin for the benefit of the people of New York and New Jersey. We have filed a Charities Registration Statement with the State of New York.

We make the following responses to the requests for information required under Section 1000.9(c).²

(1) The Rockland County Conservation Association (RCCA) works with public and private agencies to establish and maintain sound environmental policies and procedures. The Association holds public forums throughout the year featuring experts on environmental issues. Among its goals and interests are conservation of natural resources, preservation of natural beauty, clean air and water, protection of environmentally sensitive areas, acquisition and preservation of parkland, proper land use and development, energy conservation, public education regarding environmental subjects, and support of appropriate regional, state and federal environmental programs. The Association also acts as intervenor when deemed advisable. Income is provided by the membership through annual dues and donations. Membership numbers approximately 300. Organizations such as Scenic Hudson, Rockland Audubon Society, Sterling Forest Partnership, Ramapo Chapter Adirondack Mountain Club, Woman's Club of Suffern, and Keep Rockland Beautiful, Inc. are also on the membership rolls.

The Passaic River Coalition (PRC) has over 2,000 members, composed of corporations, county and municipal governments, and private individuals and organizations. As the watershed association for the Passaic River Basin, the PRC's primary goals relate to improving water quality, maintaining adequate water supplies, managing flooding, having compatible land uses with its water resource management goals, and meeting the goals of the federal Clean Water Act and the federal Safe Drinking Water Act.

(2) Neither the Rockland County Conservation Association nor the Passaic River Coalition have funds available for this purpose of providing compensation for the time and expenses necessary for expert witnesses to provide competent testimony so that the evidence provided the Siting

¹ Chapter X, Certification of Major Electric Generating Facilities; Subchapter A, Regulations Implementing Article X of the Public Service Law as enacted by Chapter 519, Section 6, of the Laws of 1992; Section 1000.9, Fund for Municipal and Local Parties.

² *Ibid.*

Board is considerate of the needs of the people of New York and New Jersey. Obtaining funds for activities such as being proposed are difficult to obtain from the private sector because of the nature of the program and the length of time which must be dedicated to the decision-making process.

(3) The proposed site is located within Rockland County, and the RCCA serves the people of this county. It is proposed that the Bowline Unit 3 facility would use water taken from the Ramapo River Watershed, which is an important part of the Passaic River Basin, as well as from the Hackensack River Watershed. Water supplies from the Ramapo River Watershed, in particular, and from the entire Passaic River Basin and Hackensack River Watershed, which are intricately interconnected, are currently stressed. The PRC, which serves the millions of people living and working in the Passaic River Basin, is obligated to be concerned about water supplies for the region.

(4) The names and qualifications of experts whom we hope will be able to serve are provided in Appendix A.

(5) To the best of our knowledge no other parties are intending to employ the experts listed in Appendix A. If another party would like to share an expert, we would welcome the opportunity to work out a mutually agreeable arrangement with that party.

(6) A detailed statement of the services to be provided by these experts (and the basis for their fees) is provided in Appendix B.

(7) Members of our organizations have participated in meetings with the applicant, and the studies that the applicant has submitted reflect some of our concerns. However, the applicant has not performed the critical independent studies and evaluations that are necessary for the Siting Board to reach reasonable conclusions regarding whether or not the proposed facility will improve both the environmental and economic conditions for the millions of people living now and in the future in the greater New York/New Jersey metropolitan region, which this facility is designed to serve. The expert testimony to be provided by the witnesses whom we are proposing be funded will vastly broaden and balance the scope of understanding of the critical issues in this case.

(8) A proposed agreement or contract to be executed with each expert is provided in Appendix C.

We hereby request up to \$35,000 to compensate these expert witnesses for the invaluable time and knowledge that they will provide the Siting Board in this case. Thank you for your attention to this request. We look forward to assisting you in your difficult task of adjudicating this case.

Sincerely yours,

Betty Hedges /aak

Betty Hedges,
President
Rockland County Conservation Association

Ella F. Filippone /aak

Ella F. Filippone
Executive Administrator
Passaic River Coalition

Anne L. Kruger

Anne L. Kruger, Ph.D.
Senior Scientist
Passaic River Coalition

C. Barbara S. Brenner
Couch White, LLP
540 Broadway
P.O. Box 22222
Albany, NY 12201-2222

Enclosures

RR-083, Anne L. Kruger, 28 August 2000

Appendix A
Credentials of Proposed Experts

<i>Name of Expert</i>	<i>Field of Expertise</i>	<i>Highest Degree or License</i>	<i>Credentials on Page</i>
Robert Nelson	Mechanical Engineering	B.S. & M.B.A.	6
Julius Levine	Electrical Engineering	B.E.E.	7
Edward A. Kiene	Civil Engineering	P.E.	8
Anne L. Kruger	Environmental Science	Ph.D.	9
Howard Horowitz	Geography	Ph.D.	11
Ella F. Filippone	Public Administration	Ph.D.	12
Chuck Stead	Social Ecology	M.A.	14
Michael Edelstein	Psychology	Ph.D.	15
Geoffrey Welch	Environmental Education	B.S.	16
Harry Leigh	Art	M.A.	17

ROBERT J. NELSON

PROFESSIONAL EXPERIENCES

Consulting Activities (1987-present)

Adjunct Professor of Marketing and Management (1987-present):

Long Island University graduate program, Polytechnic University, and Dominican College

General Energy & Cogeneration Corporation, Scarsdale, NY, Vice President for Marketing (1983-1987):

- Established marketing activities of new Cogeneration Company including customer identification, product development, and creation of sales organization.
- Participated in development of business plan.
- Selected and developed relationships with Cogeneration Equipment Suppliers.

General Electric Company, New York, NY (1965-1982):

Education and Training Manager (1981-1982):

- Administered US sales training programs for overseas engineers. In 1982 eighteen foreign engineering graduates and four domestic graduates participated in the program.
- Recruited program members, established short term assignments, developed seminars, and scheduled product training schools to provide the specialized market oriented training required for overseas positions within short time cycles.
- Created self teaching training program, General Understanding of Technical Subjects (GUTS), permitting economical worldwide distribution of product information.

Market Development (1974-1981):

- Responsible for marketing engineered products including steam, gas turbines, and electrical equipment primarily in system configurations to foreign electric utilities, petroleum and chemical companies, for installation in third world countries.
- Developed power and process equipment modules for barge installation to overcome single product proposals by competitors. Received multi-million dollar commitment, and package design concepts have been utilized by company in subsequent activities.
- Successfully negotiated gas turbine power plant and electrical equipment for synthetic fiber plant in Middle East. Worked closely with US consultants to obtain customer commitment.

Process Computer Sales (1965 - 1974):

- Marketing industrial process control computers and instrumentation for the automation of refineries and chemical plants in the US and overseas.
- Led group as lead sales engineer, to develop computer hardware and software application packages utilized by ESSO for their domestic and overseas refineries. System sales totaled \$5,000,000.

Bunker-Ramo Corporation (TRW Computer Co.) (1961-1965):

Regional Manager: Responsible for activities of district manager, sales engineers, and field service personnel in New York, Philadelphia, and Boston marketing process control computer systems to electric utility, industrial and government customers. Process computer activities were purchased by General Electric in 1965.

Westinghouse Electric Corporation, New York, NY (1947-1961):

Senior Sales Engineer (1956-1961):

Responsible for sales of electrical and mechanical equipment and systems to utility customers.

Sales Engineer (1950 - 1956):

Marketing industrial electric products to major petroleum and chemical customers.

Manufacturing and Sales Training Program (1947 - 1950)

EDUCATION

<i>Institution and Location</i>	<i>Degree</i>	<i>Year</i>	<i>Field of Study</i>
New York University, New York, NY	M.B.A.	1954	Business Administration, Marketing & Finance
New York University, New York, NY	B.M.E.	1947	Mechanical Engineering

OTHER ACTIVITIES

Active in community affairs, including Chairman of Village of Nyack, NY, Planning Board (1997-1998).

JULIUS LEVINE

PROFESSIONAL EXPERIENCES

- Retired in 1992 from ITT Avionics Division as a Senior Technical Consultant in the "Advanced Development Group", supervising staff in analysis, design/development and construction of RF power transmitters, and communication systems. Also infrared communication systems and cryogenic receivers.
- Over 40 years of experience working for companies such as Loral, Raytheon, Instrument Systems, General Instruments, and Electronic Transformer Company. My experience ranged from the design of power transformers, and magnetic amplifier control systems to military electronic systems. The military electronic systems included both RF and IR communications, as well as a multitude of electronic warfare systems.

EDUCATION

Institution and Location

Cooper Union, New York, NY

Degree

B.E.E.

Field of Study

Electrical Engineering)

EDWARD A. KIENE

PROFESSIONAL EXPERIENCE

Orange and Rockland Utilities, Inc. (1956 -1992):

Retired as Superintendent, Gas and Hydroelectric Turbines. Prior experiences: Manager, Buildings and Grounds; Supervising Civil Engineer; Senior Civil Engineer. Recipient of Chairman's Special Award. Recipient of Community Service Award. Responsibilities included all types of survey and civil engineering, construction supervision of buildings, transmission lines and hydroelectric units, design of reinforced concrete units and architectural design.

Clark and Rapuano, Consulting Engineers (1953-1956):

Construction Supervisor, New York State Thruway (Hillburn - Harrison).

EDUCATION AND LICENSES

Westchester Community College, A.A.

Professional Engineer, New York State Education Department, Certificate #043059-1

PROFESSIONAL AFFILIATIONS

Past President, NY State Society of Professional Engineers

Member, American Concrete Institute

VOLUNTEER ORGANIZATIONS

Rockland County Community College Committee

Plans and cost estimates for the renovation of the Welfare Home at Viola in order to establish the Community College, 1958.

Historical Society of Rockland County

Former member, Board of Directors

Upper Saddle River Emergency Services

Designed building on Upper Saddle River Road

Boy Scouts of America

Member, 1936

Former member, Executive Committee; Distinguished Service Medal, 1979

Former member, Construction Committee; Designed new Service Center, Camp Bullowa, 1988

Good Samaritan Hospital

Volunteer, 1977-present; Gift Shop, Annual Ball

Good Samaritan Award, 1987

ANNE L. KRUGER, PH.D.

RESEARCH AND PROFESSIONAL EXPERIENCES

Senior Scientist for Passaic River Coalition (1992-present):

Continuing analysis and interpretation of available surface water quality data gathered from 1960 to present in the Passaic River Basin. Investigating chemical and physical characteristics of water bodies and underlying sediments and their relationships to algal growth. Responsible for development and implementation of projects and programs related to research initiatives dealing with surface and ground water resources. Reviewing proposals for water quality standards and other environmental regulations. Writing articles, reports and position papers related to these responsibilities.

Environmental Consultant for J. H. Crow Company, Hackettstown, NJ (1986-1992):

Investigated water suspected to be contaminated by heavy metals, volatile organics, petroleum hydrocarbons, ammonium sulfate, fluoride, and other contaminants. Assessed risks, and determined likely sources of the contamination. Studied wetlands, unconsolidated sediments, karst, and hardrock terranes. Experienced in the computer aided study of data to learn about physical/ chemical/biological interactions and migration of substances in the subsurface, and interactions between subsurface and surface. Managed environmental assessments for both industry and government clients, including cases involving ISRA (Industrial Site Responsibility Act), NJPDES, UST, and RCRA. Worked to develop treatment for a chemical industry wastewater.

Coordinator of New Jersey Water Resources Coalition (1983-85):

Augmented the effectiveness of some twenty environmental organizations by informing them about statewide water resource issues, helping them to develop consensus positions, and representing them with state and national officials. Investigated impacts of land uses on water resources, and analyzed potential impacts of public policy on water quality. Analyzed environmental information and policies, and helped organize a computer network.

Investigator of Effects on Water Quality of Landfills, Wetlands and Other Areas (1972-1983):

Evaluated effects on health of living close to a hazardous waste landfill for a plaintiff's attorney (1983). The case was settled to the plaintiff's satisfaction. Investigated ground water contamination cases (1975-1980), studying the chemical, hydrogeologic, health and sociopolitic effects of the pollution, as Environmental Commissioner of South Brunswick, NJ, and in other roles. Developed computerized analytic methods for examining the biogeochemistry of pollutant plumes. Studies identified new cases of contamination that posed health dangers, and helped to confirm sources of contaminants. Studied pollutant and nutrient attenuation in subsurfaces and wetlands (1972-1979).

Hazardous Waste Research at Princeton University (1980-82):

Analyzed data on industrial waste generation and disposition in New Jersey as Research Assistant for the Hazardous Waste Research Program, Chemical Engineering Department of Princeton University, Princeton, NJ.

Chemical Analyst for Toxics in Water and Soil (1977-80):

Conducted chemical analysis for toxic trace elements in water and soil by atomic absorption for the NJ Program of Environmental Cancer and Toxic Substances, in the Environmental Science Department, Rutgers University.

Leader in Environmental Groups:

- Environmental Commission of South Brunswick Township, Chairman, 1972-79
- Drainage Study Committee, South Brunswick, Chairman, 1975-77
- Lower Raritan/Middlesex County Water Resource Association (208), Vice Chairman, 1975-85
- Association of New Jersey Environmental Commissions, Trustee/Treasurer, 1976-86
- Water Quality Task Force, South Brunswick, Vice Chairman, 1978-79
- Middlesex County Toxics Task Force, Coordinator, 1978-83
- Citizen Group on Hazardous Waste, Member, 1979-83

Medical Researcher:

Involved in heart disease and cancer research as a Laboratory Technician at Sloan-Kettering Institute in New York, NY (1954-55), and biochemical synthesis research at the Université de Lyon in Lyon, France (1953-54). Wrote literature review on neuronal transmission while an undergraduate (1953). Interested in studies of effects on human behavior of environmental phenomena, central nervous system medications, and neurotoxicants.

ANNE L. KRUGER, PH.D. (cont.)

EDUCATION				
<i>Institution and Location</i>	<i>Degree</i>	<i>Year</i>	<i>Honors</i>	<i>Field of Study</i>
Rutgers University, New Brunswick, NJ	Ph.D.	1977-81		Environmental Science
Rutgers University, New Brunswick, NJ	M.S.	1976-77		Ecology
Rutgers University, New Brunswick, NJ	M.S.	1972-76		Environmental Science
Columbia University, New York, NY	None	1954-55		Physics
Université de Lyon, Lyon, France	None	1953-54	Fulbright Scholar	Biochemistry
University of Kansas, Lawrence, KS	A.B.	1949-53	Phi Beta Kappa & Sigma Pi Sigma	Chemistry

LICENSES AND CERTIFICATES

Safety at Hazardous Materials Sites, 40 hours, 29 CFR 1910, 120(e)(2), 1989-1993.
Sanitary Inspector First Grade, New Jersey Department of Health, 1978-1998.

HONORS

Visiting Assistant Professor, Environmental Science Department, Rutgers University, 1982-85
Fulbright Scholar, United States Government grant for study in France, 1953-54
Sigma Pi Sigma (honorary physics society), University of Kansas, 1953
Phi Beta Kappa, University of Kansas, 1952

PUBLICATIONS

Kruger, A.L., E.F. Filippone, and M.S. DuBois. 1999. Impacts on Natural Resources from Developments Proposed for Ramapo River Watershed in New York. Passaic River Coalition, Basking Ridge, NJ.
Filippone, E.F., A.L. Kruger, and A.K. Gibson. 1998. Planning for Well Head Protection for Ground Water from the Whippany, Chatham & Millburn Valleys of the Buried Valley Aquifer Systems. Passaic River Coalition, Basking Ridge, NJ.
Kruger, A.L. and E.F. Filippone. 1994. The Restoration of the Floodway of the Central Passaic River Basin -- An Economically and Environmentally Beneficial Project. Passaic River Coalition, Basking Ridge, NJ.
Kruger, A.L. 1993. Report on Eutrophication Study of Lake Parsippany. Passaic River Coalition, Basking Ridge, NJ.
Kruger, A. L. 1993. Recommendations on New Jersey Pollutant Discharge Elimination System Program. Passaic River Coalition, Basking Ridge, NJ.
Gaffney, J. T. and A. L. Kruger. 1984. Cranbury, Mount Laurel II & Water Resources. Stony Brook-Millstone Watershed Association, Pennington, NJ.
Kruger, A. L. 1984. Critique of Present Ground Water Quality Protection Strategies in New Jersey & Comparison with an Ecologically Based Strategy. New Jersey Water Resources Coalition, Pennington, NJ.
Kruger, A. L. 1982. Industrial Wastes: Generation and Disposition in New Jersey. PU/CEES Working Paper No. 55. Hazardous Waste Research Program, Center for Energy and Environmental Studies, School of Engineering/Applied Science, Princeton University, Princeton, NJ.
Kruger, A. L. 1982. Environmental Considerations in Siting Industrial Waste Processing Complexes. PU/CEES Working Paper No. 56A. Ibid.
Kruger, A. L. 1982. Alternatives to Landfilling Wastes. Proceedings of "A Northeast Conference, The Impact of Waste Storage and Disposal on Ground-Water Resources", presented by US Geological Survey and Center for Environmental Research, Cornell University, June 28-July 1, 1982, Ithaca, NY. Also PU/CEES Working Paper No. 57. Ibid.

Note: Technical reports written from 1986 to 1991 were done for clients and not for publication.

HOWARD HOROWITZ, PH.D.

ELLA F. FILIPPONE, PH.D.

RESEARCH AND PROFESSIONAL EXPERIENCES

Executive Administrator for Passaic River Coalition, Basking Ridge, NJ:

Responsibility for overall development and implementation of all projects. Executes general corporate development programs, 1970-present.

Executive Vice President for Stricker Research Associates, Inc., New York, NY:

Management consultant to Fortune 500 companies. Vice President, 1959-1960; Member of Board of Directors, 1960-1964; Full Partnership, 1961-1964.

Business Related Activities:

Essex County Recreation and Open Space Advisory Board, Member, 1999-present.

Passaic County Project 20/20, Board of Trustees and Chairman of Environmental Committee, 1999-present.

N.J. Underground Storage Tank Remediation Task Force, Member, 1999-present.

Watershed Management Area #6, Policy Advisory Committee, Chairman, 1998-present.

N.J. Dredging Project Facilitation Task Force, Appointee of Governor, 1997-present.

N.J. Water Supply Advisory Council, Member, 1996-present.

Passaic River Task Group, 1996-1999.

Governor's Water Quality Advisory Council, 1995-present.

Liaison Committee with USGS on National Water Quality Assessment, 1994-present.

N.J. Drinking Water Quality Institute, N.J. Assembly Appointee, 1993-present.

Whippany River Watershed Management Project, participant in various committees, 1993-present.

Columbia University Seminar, Environmental Issues, Member, 1992, Vice Chairman, 1993-1996.

Various Stakeholder groups, Roundtables conducted by NJDEP on water quality issues, participant, 1992-present.

Passaic Valley Sewerage Commissioners Citizen Advisory Committee for the Beneficial Uses of Sludge, Chairman, 1991-1994.

Soil Conservation Service Great Swamp Technical Advisory Committee, Member, 1991-1996.

Technical Committee, Passaic Valley Sewerage Commissioners, Member, 1989-present.

The University Council on Water Resources, Carbondale, Illinois, Member, Reviewer, 1988-present.

Member, Task Force on Wastewater Management of Volatile Organic Compounds, NJDEP, 1988.

"Evaluation of Army Corps of Engineers Passaic River Basin Flood Management Project" for the Counties of Bergen, Hudson, and Morris, Project Director, 1985-1989.

Expert on water resources, Passaic County Superior Court, Case of Brugh vs. State of New Jersey, on behalf of flood victims, 1984-present.

Pretreatment Advisory Committee, Region 8, NJ Department of Environmental Protection, Vice Chairman, 1984.

Advisory Committee, Great Swamp Point/Non-point Water Quality Study Task Force, 1983-1988.

Waterfront Cleanup Project Coordination Committee of the Port of NY and NJ, 1982.

Book Review Boards for American Association for the Advancement of Science, American Water Resources Association, and Journal of Growth Policy, 1981-present.

Passaic River Restoration Project, Director, 1981-present.

Passaic Valley Sewerage Commissioners Combined Sewage Overflow Committee, 1981.

New Jersey Task Force on the NJPDES, 1981.

New Jersey Task Force on Oil and Grease, 1981.

Passaic Valley Ground Water Protection Committee, 1980-present.

Passaic River Citizens' Task Force on Flood Control (established by the State), 1978-80.

208 Northeast NJ Wastewater Management Public Advisory Committee, Secretary of Chairman's Advisory Council, 1977; Vice Chairman, 1978-80.

201 Citizens Advisory Committees, Upper Passaic River, 1976-81, Whippany River, 1976-80.

Greater Newark Chamber of Commerce, Environmental Committee, 1975-77.

New Jersey Council on Environmental Education, Special Advisor, 1973-75.

The Gill School Summer School on Environmental Education, Board of Advisors, 1970-73.

Somerset County Park Commission, Instructor of paraprofessional teachers and park volunteers, 1970.

Citizens for Conservation, Founder, Director and Public Relations Chairman, 1969.

ELLA F. FILIPPONE, PH.D. (cont.)

EDUCATION

<i>Institution and Location</i>	<i>Degree</i>	<i>Year</i>	<i>Field of Study</i>
University of Beverly Hills, Beverly Hills, CA	Ph.D.	'82	Public Administration
University of Beverly Hills, Beverly Hills, CA	B.A.	'80	Public Administration
Katharine Gibbs School, New York, NY	2 yr. academic	'54	Business & Liberal Arts

SPECIAL GRANTS

Grant, United States/Japan Friendship Committee to Participate in Environmental Law Delegation, 1988.
Seminar and Workshops, Public Health and Water - Working Together for Protection, Preservation and Pollution Abatement; grant from New Jersey Department of Environmental Protection, 1982.
German-Marshall Fund of the US, Travel grant to study ground water protection and preservation, and related institutional processes in Germany, Austria, Switzerland, the Netherlands & France, 1982.
Urban Dynamics - A Decision-Making Model, US Department of Health, Education and Welfare, 1978.
Natural Resources Inventory of Morris County, NJ, Morris County Board of Chosen Freeholders, 1978.
EPA Water Quality Awareness Program, US Environmental Protection Agency, 1975.
Water Quality Workshops, US Environmental Protection Agency, 1974.

PUBLICATIONS

Kruger, A.L., E.F. Filippone, and M.S. DuBois. 1999. Impacts on Natural Resources from Developments Proposed for Ramapo River Watershed in New York. Passaic River Coalition, Basking Ridge, NJ.
Filippone, E.F., A.L. Kruger, and A.K. Gibson. 1998. Planning for Well Head Protection for Ground Water from the Whippany, Chatham & Millburn Valleys of the Buried Valley Aquifer Systems. Passaic River Coalition, Basking Ridge, NJ.
Kruger, A.L. and E. F. Filippone. 1994. The Restoration of the Floodway of the Central Passaic River Basin -- An Economically and Environmentally Beneficial Project. Passaic River Coalition, Basking Ridge, NJ.
Filippone, EF. 1991. Keeping Watch on the Floodplain. National Wetlands Newsletter, Environmental Law Institute, Washington, D.C., Volume 13, Number 2, March/April 1991.
Filippone, EF. 1991. Statement at New Jersey Clean Water Council on Future Directions for New Jersey's Water Quality Standards and Permitting Procedures, 11 June 1991.
Filippone, EF. 1991. Testimony before the House Of Representatives, Subcommittee on Water Resources, Committee on Public Works and Transportation, Washington, DC, 23 October 1991.
Filippone, EF and J. Walsh. 1990. The Flood Plain Saga in the Passaic River Basin. Population and Environment Journal, Vanderbilt University.
Filippone, EF. 1990. Statement presented at Legislative Public Hearing on the Reclassification of Certain Waters in the Passaic-Newark Drainage Basin, Pomona, NY, 7 March 1990.
Filippone, EF. 1989-1992. Writer, Weekly Column, "Along the Passaic" (32 newspapers).
Filippone, EF. 1987. The Watershed Association's Role in Water Resources Management. Conference on Transboundary Water: Supply, Quality and Legal Issues. Ramapo College of New Jersey.
Filippone, EF., Editor and co-author. 1982. Natural Resources Inventory of the Central Passaic River Basin, Morris County, NJ. 4 Volumes and Appendix.
Filippone, EF. 1977. Water Quality Planning (208 Programs). Woodrow Wilson School, Princeton University, Princeton, NJ.

HONORS

Achievement Award, US Department of the Interior, Heritage Conservation & Recreation Service, 1981.
Special Award of Merit for citizen activism and environmental education, US EPA, Region II, 1975.

CHUCK STEAD

PROFESSIONAL EXPERIENCES

Nature Educator:

Have worked with Ed Beiber of the **Nature Place Day Camp** every summer since 1986. Our focus has been a noncompetitive approach to nature education. Have instituted nature/story hikes throughout Harriman Park since the mid 1980s.

Storyteller:

Published 'Ramapo Mountain Poet' (1977). Have been working as a storyteller for the passed twenty years. Produced and hosted local cable storytelling program (91-94). Collection of original work to be published later this year: Back Porch Stories.

Adjunct Faculty:

Ramapo College, Mahwah, NJ, in Theoretical and Applied Sciences. Courses taught include Social Ecology, Environmental Studies, Environmental History, since Spring 1998.

Historian:

Yesteryear Video Series, (1980) prod. New York State Council on the Arts, twelve hour video lecture series on loan with the RCLS system since 1980. Producer/Director, To Die With Honor, (1980-81) historical docudrama for NYSCA. Municipal Historian, Village of Hillburn (1993-99), and Interim Historian, Village of Sloatsburg (1999). Have submitted original archival research to the BIA for documentation on the Ramapo Indian Movement (1980s). Wrote and produced segment of 'Haunted History' for The History Channel (1999).

Previous Work:

- **Ramapo Mountain Theater**, funded by the America the Beautiful Fund (1979-81) produced original student performances concerning a sense of Place'.
- **Antrim Playhouse**, Suffern, NY Artistic Director (1983-88) **Empire State College**, teacher: Social Ecology, Community and Society (1994-96).
- **Suffern Rail Road Museum**, (1998) worked toward the preservation of this historical landmark, (earliest Wells Fargo Station in the state).

EDUCATION

<i>Institution and Location</i>	<i>Degree</i>	<i>Field of Study</i>
Institute of Social Ecology, Goddard College, Plainfield, VT	Advanced Study	Social Ecology
Empire State College	M.A.	Social Policy
Empire State College	B.A.	Social Policy
Rockland Community College	A.A.	

HONORS

- NYS Recreation & Park Society Arts & Humanities Award 1993
- County Executive Arts Award, Individual Artist 1997

MICHAEL EDELSTEIN

GEOFFREY WELCH

PROFESSIONAL EXPERIENCES

Leader in Activities related to Ramapo River Watershed (1981-present):

Founder and Chairman of Ramapo River Committee. Activities related to the Ramapo River Watershed include the following:

- Extensive research and field studies;
- Non-Point Source Pollution Assessment of the Mahwah River Watershed for New York State;
- Study for the Village of Suffern, NY, of the watershed within the municipality, which included preparation of ground water rules and regulations, and mapping zones of protection for municipal well field;
- Production of a video documentary on the Ramapo Landfill, that was shown on TKR Cable;
- Continuing video taping of the Ramapo River Watershed;
- Board Member and Chair, Water Committee of the Citizens' Environmental Coalition of New York State;
- Board Member, Orange Environment Inc.
- Board Member, Rockland County Conservation Association;
- Member, Rockland County Park Commission;
- Member, Rockland County Water Quality Committee;
- Member, Sterling Forest Coalition;
- Board Member, Sterling Forest Partnership;
- Member, Bear Mountain League of Naturalists;
- Lecturer at Ramapo College of New Jersey, Sierra Club of Rockland County, Sierra Club in North Jersey, Cornell Co-op Extension of Rockland, Orange County Earth Day, Rockland County Conservation Association, Rockland County Environmental Management Council, American Chemical Society, Rotary Clubs, Sloatsburg Library, Sterling Forest Day, the Highlands Coalition, Metropolitan Canoe & Kayak Club, Nature Place Camp, various high schools, Orange County Historic Society, and the Highlands Historical Society;
- Workshop leader at the Mid Atlantic Environmental Conference held in 1995 at Ramapo College of New Jersey;
- Organizer of the Ramapo River Watershed conference at the Second Mid Atlantic Environmental Conference held in 1996 at Ramapo College of New Jersey;
- Organizer of the Second Annual Ramapo River Watershed conference held in 1997 in Suffern, NY;
- Organizer of the Third Annual Ramapo River Watershed conference held in 1998 at Ramapo College;
- Media appearances include WRKL Radio, Channel 7 Eye Witness News, WPIX News, 48 Hours on the CBS network, Eye on Rockland, The Alternate Report and Back Porch Stories on TKR Cable, Regional News Network, Albany TV, Manhattan Cable, The New York Times, and various other New York and New Jersey newspapers;
- Music director for the 1994 and 1995 Earth Day at Bear Mountain Interstate Park, for which he composed the Bear Mountain Overture to open the events; and
- Composer of musical score for documentary on Ecological Literacy.

Musician and Performer, New York, NY (1970-1980):

Composer and performer of his compositions at The Circle Repertory Theater, The Kitchen Performing Space, Fordham University, and at various environmental gatherings. Participant in other artistic endeavors.

Art Teacher, several secondary schools, New York, NY (1969-1970)

EDUCATION

<i>Institution and Location</i>	<i>Degree</i>	<i>Year</i>	<i>Field of Study</i>
New York University, New York, NY	None	1969	Education
Emerson College, Boston, MA	B.S.	1968	Speech (communications)

HONORS

Ben Kassin Environmental Award from Orange Environment for stewardship of the Ramapo River (1997);
Rockland County Executive Award (1996);
Annual Award from the Citizens' Environmental Coalition of New York State (1993).

HARRY LEIGH

PROFESSIONAL EXHIBITIONS & EXPERIENCES

One - Man Exhibitions:

Blue Hill Cultural Center, Pearl River, NY, 1992
Thorpe Intermedia Gallery, Sparkill, NY, 1989
Ramapo College, Mahwah, N.J., 1987
Rockland Community College, Suffern, NY, 1982
O.K. Harris, New York, NY, 1978 & 1974
Berkshire Museum, Pittsfield, MA, 1971
Brata Gallery, New York, NY, 1969 & 1967

Group Shows:

The Rockland Center for the Arts, West Nyack, NY, "26 Sculptors In Their Environments", 1999
Blue Hill Cultural Center, Pearl River, NY, "Interpreting the River", 1997-1998
"A Century of Mac Dowell Colony Artists", Currier Gallery of Art, Manchester, NH, 1996-1997
National Academy of Design, NY, 1997
Wichita Art Museum, Kansas, 1997
Rockland Community College, Rockland, NY, "Art From The Colonies", 1996
The Parrish Art Museum, Southampton, NY, "Thirty Fifth Juried Exhibition", 1996
Rockland Center for the Arts, West Nyack, NY, "Rockland Connection - Part II", 1996
Rockland County Conservation Association Show, Pomona, NY, 1995
Art Works, Pomona, NY, 1995
Anita Shapolsky Gallery, New York, NY, 1995
Anderson Gallery, Buffalo, NY, "Collection Selection", "X-Sightings '93", 1993
Pierson Lakes Exhibition, Sterlington, NY, "Art For The Home", 1991
Rockland Center for the Arts, West Nyack, NY, "The Rockland Connection", 1991
Anita Shapolsky Gallery, New York, NY, 1991 & 1989 & 1988
Josiah White Exhibition Center, Jim Thorpe, PA, "Contemporary Sculpture", 1988
A.I.R. Gallery, New York, NY, "Annual Holiday Invitational", 1987
Burchfield Art Center, Buffalo, NY, "Works From The Permanent Collection, 1986", 1986
Clove Furnace Historic Site, Arden, NY, "The Art of Rockland and Orange", 1986
Kenkeleba Gallery, New York, NY, "The Gathering of the Avant Garde: The Lower East Side", 1985
Thorpe Intermedia Gallery, Sparkill, NY, 1984 & 1983
Noel Fine Art, Bronxville, NY, "13 Uptown", 1983
Rockland Center for the Arts, West Nyack, NY, 1983, 1982 & 1977
Clarksville on the Hudson Gallery, Nyack, NY, 1976
Pace University, New York, NY, "Off the Wall", 1974
O.K. Harris, New York, NY, 1972
Finch College, New York, NY, "Projected Artist at Work", 1971
Rockland Foundation, Nyack, NY, 1971, 1967, 1963
Audubon Artist, New York, NY, 28th Annual Exhibition, 1970
Westchester Art Society, White Plains, NY, "Annual Exhibition", 1967, 1968, 1970
Thorne Museum, Keen, NH, 1970
Silvermine Guild of Artists, New Canaan, CT, 20th New England Exhibition, 1969
Berkshire Museum, Pittsfield, MA, Berkshire Art Annual, 1969, 1967
Brata Gallery, New York, NY, "Tenth Street Now", 1964-1965
Rockland Community College, Suffern, NY, "Rockland County Artists", 1964, 1967
Museum of Contemporary Crafts, New York, NY, "Young Americans", 1962
Everson Museum, Syracuse, NY, 22nd Ceramic National, 1962
Albany Institute of History and Art, Albany, NY, 1957
Rochester Memorial Gallery, Rochester, NY, Invitational, 1953
Albright Art Gallery, Buffalo, NY, "The Western NY Show", 1952, 1953 & 1958
Adjunct Professor, Rockland Community College, Suffern, NY (1971-present)

HARRY LEIGH (cont.)

EDUCATION

<i>Institution and Location</i>	<i>Degree</i>	<i>Year</i>	<i>Field of Study</i>
Columbia University, New York, NY	M.A.	1959	Art
State University of New York, Buffalo, NY	B.S.	1953	Art
Albright Art School, Buffalo, NY, 1952		1952	Art

AWARDS

Thorpe Intermedia Fellowship	1988 - 1989
Hand Hollow Foundation	1980
CAPS Fellowship	1978 - 1979
Yaddo Fellowship	1972, 1979, 1980, 1987, 1990, 1996
MacDowell Fellowship	1968, 1969, 1970, 1972, 1974, 1975, 1983, 1985, 1986
Audubon Artist	Sculpture 1970
Berkshire Museum	Sculpture 1969, 1970
Westchester Art Society	Sculpture 1967

COLLECTIONS

The Birchfield Center, Buffalo, NY
Richmond Museum of Fine Arts, Richmond, VA
Ulrich Museum of Art, Wichita, KS

APPOINTMENTS

Art In Public Places Committee, Rockland County, NY 1987-1994
The MacDowell Colony Fellows Executive Committee, New York, NY:
Committee Member 1969-1994
Treasurer 1982-1994
Rockland Center for the Arts, formerly the Rockland Foundation, West Nyack, NY:
Exhibition Committee, 1967-1969, Co-Chair, & 1981-1983

Appendix B
Services to be Provided by Experts

Each expert, who is funded, will provide written or oral testimony regarding aspects of the case (99-F-1164), that is impacts of the proposal made by Southern Energy Bowline, LLC, to the Siting Board, that are within the expert's area of expertise. If funds are provided for a particular expert, then the expert and the Passaic River Coalition (PRC) will enter into a contract, such as that proposed in Appendix C. The expert will submit invoices to the PRC for services rendered, and be paid by the PRC. It is expected that most contracts will be based on an hourly rate, although a lump sum contract is also a possibility. All accounting procedures and transfer of funds will be in accordance with law and decisions of the Siting Board.

Generally speaking, the experts named in Appendix A will focus on the areas of concern listed below:

<i>Area of Concern</i>	<i>Expert</i>	<i>Field of Expertise</i>
Energy Production and Air Quality	Robert Nelson	Mechanical Engineering
	Julius Levine	Electrical Engineering
	Edward A. Kiene	Civil Engineering
Water and Land Resources	Anne L. Kruger	Environmental Science
	Howard Horowitz	Geography
Socioeconomic Resources	Ella F. Filippone	Public Administration
	Chuck Stead	Social Ecology
	Michael Edelstein	Psychology
Cultural, Visual & Recreational Resources	Geoffrey Welch	Environmental Education
	Harry Leigh	Art

The areas of concern listed above are discussed in various sections of the application submitted by Southern Energy Bowline, LLC, as outlined in the table on the next page:³

³ Southern Energy Bowline, LLC. 2000. Bowline Unit 3, Town of Haverstraw, Rockland County, New York, Application for Certification of a Major Electric Generating Facility Under Article X of the New York State Public Service Law. Submitted 20 March 2000, *et. seq.*

Areas of Concern Discussed in Application for Bowline Unit 3

<i>Areas of Concern:</i>	<i>Section</i>
Energy Production and Air Quality	
Introduction	1
Project description	3
Air resources	5
Noise	12
Traffic and Transportation	13
Water and Land Resources	
Project description	3
Soils, geology and seismology	6
Water resources	7
Aquatic resources	8
Terrestrial ecology and vegetation	9
Socioeconomic Resources	
Public involvement program	2
Land use, zoning, and public policy	4
Socioeconomics	15
Alternatives	16
Multi-area production cost simulation model (MAPS)	17
Cultural, Visual & Recreational Resources	
Visual impact assessment	10
Cultural resources	11
Recreation	14

Appendix C
Example of Type of Contract to be Executed
between Selected Expert and the Passaic River Coalition

CONTRACT
ENVIRONMENTAL CONSULTING SERVICES BETWEEN
THE PASSAIC RIVER COALITION
AND
[NAME OF EXPERT]

This **AGREEMENT**, made as of the [DATE], by and between the **PASSAIC RIVER COALITION** (hereafter the "PRC"), having an office at 246 Madisonville Road, Basking Ridge, New Jersey 07920, and [NAME OF EXPERT], having an office at [ADDRESS OF EXPERT],

WITNESSETH:

WHEREAS, the PRC requires a consultant with respect to environmental matters regarding the application of Sithe Energies, Inc., Case #98F-1885, before the State of New York Department of Public Service Board on Electric Generation Siting and the Environment; and

WHEREAS, [NAME OF EXPERT] possesses the experience and expertise to perform such consulting services; and

WHEREAS, by Resolution duly adopted at its meeting of the Board of Trustees, the PRC retained [NAME OF EXPERT], in order that [NAME OF EXPERT] may render the consulting services to the PRC; and

WHEREAS, the PRC hereby desires to set forth herein the terms and conditions of such retention.

NOW, THEREFORE, in consideration of the mutual covenants and agreements set forth herein, the parties hereto agree as follows:

1. **RETENTION OF [NAME OF EXPERT]**

The PRC hereby retains [NAME OF EXPERT], and [NAME OF EXPERT] hereby agrees to be retained by the PRC, to furnish consulting services. All of the consulting services will be performed personally by [NAME OF EXPERT], or under the direction of [NAME OF EXPERT]. [NAME OF EXPERT] shall devote the time necessary to furnish such services properly and diligently.

2. **CONSULTING SERVICES**

[NAME OF EXPERT] shall render the consulting services to the PRC only upon the express request of the Executive Administrator, to whom she shall report. The consulting services shall include all necessary appearances, research, investigation, correspondence, preparation and drafting of documents, conferences in person and by telephone with the PRC and others, and all related work to serve the PRC properly, pursuant to the terms hereof.

3. TERM AND TERMINATION

The term of this Agreement commences as of the date of [DATE], and shall continue until it is terminated by either party on thirty (30) days written notice to the other party. In the event that the PRC cancels the Agreement, the PRC will have no liability or payment obligation to [NAME OF EXPERT] after the effective date of termination, except for the value of services rendered by [NAME OF EXPERT] up to and including the date of termination.

4. COMPENSATION

For rendering the consulting services hereunder, [NAME OF EXPERT] shall receive a fee of [AMOUNT TO BE DETERMINED]. All compensation and reasonable and necessary disbursements hereunder shall be payable [IN A MANNER TO BE DETERMINED], in accordance with the PRC's regular accounting policies and procedures. All disbursements shall be substantiated to the PRC's reasonable satisfaction. In no event shall total compensation payable to [NAME OF EXPERT] hereunder exceed the sum of [AMOUNT TO BE DETERMINED].

5. INDEPENDENT CONTRACTOR STATUS

The parties hereto acknowledge that [NAME OF EXPERT] and her employees, if any, are independent contractors and not employees of the PRC.

6. INDEMNIFICATION

[NAME OF EXPERT] agrees to indemnify and hold the PRC harmless from and against any and all lawsuits, judgments or obligations, including legal fees, arising as a result of work performed pursuant to this Agreement, which are not caused by, nor arise from, the negligent acts or omissions of the PRC.

7. CONFLICTS

During the term of this Agreement, [NAME OF EXPERT] agrees to refrain from representing, consulting or advising, either directly or indirectly, any person, association or corporation with interests which are or have the potential of being in conflict with those of the PRC.

IN WITNESS WHEREOF, the parties hereto have executed this Agreement as of the date first set forth above.

WITNESS:

PASSAIC RIVER COALITION

Ella F. Filippone, Executive Administrator

WITNESS:

[NAME OF EXPERT]