



For a thriving New England

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August 7, 2017

Energy Facility Siting Board
99 Jefferson Blvd.
Warwick, RI 02888

Re: EFSB Docket SB 2015-06

To the EFSB:

Enclosed please find summaries of the following two documents: (1) the testimony of Dr. J. Timmons Roberts previously filed by CLF on March 31, 2016; and (2) the testimony of Scott Comings previously filed by CLF on October 13, 2016. These summaries are being filed in furtherance of the EFSB's Procedural Schedule, which directs that "[a]ll testimony must include an executive summary of the testimony." CLF does not plan to re-file the full testimony of Dr. Roberts or Mr. Comings unless so directed by the EFSB.

An original and three copies of each summary is enclosed.

Sincerely,

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SUMMARY

Scott Comings is Associate State Director of the Nature Conservancy's Rhode Island office. He has facilitated hundreds of scientific research projects and habitat assessments throughout Rhode Island. These research projects have included assessment of the conservation value of the northwestern part of the state, including Burrillville, and have led Mr. Comings to work on conserving land in this area due to its unique ecological value.

Mr. Comings's testimony proceeds in two parts.

First, Mr. Comings discusses the ecological principle of habitat connectivity. He explains why connectivity is increasingly necessary today as a result of development-driven habitat loss and the need for resiliency as the climate changes. He further explains that protecting habitat connectivity is more important for wildlife conservation than focusing on individual species. The section concludes with a discussion of the methodology used to assess habitat connectivity.

Second, Mr. Comings applies this methodology to the location selected for the proposed Invenergy plant. He begins broadly, showing how highly developed the east coast is from Washington, DC to Boston. He points out that western Rhode Island is one of the few relatively undeveloped pockets of connected habitat left in this large area. He then zooms in to the site of the proposed plant, showing how the site is a pinch-point for a corridor of undeveloped land suitable as wildlife habitat. He explains that building the plant would cut this habitat corridor into fragments, severely undermining if not eliminating its unique ecological value.

Mr. Comings concludes by urging the Energy Facility Siting Board to reject Invenergy's application on the basis that the plant would pose unacceptable harm to the environment by destroying an ecologically important wildlife corridor.

SUMMARY

Dr. Roberts is the Ittleson Professor of Environmental Studies and Sociology at the Institute at Brown for Environment and Society. He is the author or a principal co-author of many works pertaining to climate change: books published by peer-reviewed academic presses; chapters of books published by academic presses; and articles appearing in scholarly publications.

Dr. Roberts's testimony proceeds in two parts.

In the first part, Dr. Roberts discusses the Invenergy proposal in the context of the Resilient Rhode Island Act. Dr. Roberts testifies that if the Invenergy plant is built, it will be impossible for Rhode Island to meet the short-, medium-, or long-term carbon-emission-reduction goals set forth in the statute.

In the second part of his testimony, Dr. Roberts discusses the implications of the Invenergy proposal in the broader context of climate change. In this discussion, he situates what happens in Rhode Island in a national and global context. Dr. Roberts concludes that the global consequences of climate change may well be catastrophic, and he specifically considers sea-level rise, extreme weather events, drought, and disease.

Dr. Roberts concludes his testimony by urging the EFSB to deny Invenergy a permit to build its proposed plant.