

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

ENERGY FACILITY SITING BOARD

In Re. Invenergy Thermal Development LLC       )  
Application to Construct the Clear River       )       EFSB Docket SB-2015-06  
Energy Center in Burrillville, RI       )

PRE-FILED TESTIMONY OF DAVID B. HARRIS

Summary:

The pre-filed testimony of David B. Harris establishes that he is the owner of the largest tract of private land in the immediate vicinity of the proposed Clear River Energy Center ("CREC"). His property abuts the proposed CREC site and the proposed entrance to the CREC facility would be located directly across the street from Mr. Harris' property. Mr. Harris owns sixty-eight (68) acres of land at that location and resides there with his family. He has invested almost \$1,000,000.00 into acquiring and improving his property since it was purchased in 2004. In addition to his personal residential interests in this proceeding, Mr. Harris intends to use part of his property for a future commercial interest and he has already taken substantial steps and made substantial investments in implementing his business plan. Mr. Harris' testimony establishes that the construction and operation of CREC will have a substantial negative affect on the present and future use and enjoyment of his property, the present and future value of his property, the future income potential of his property, and on the health and safety of his family and guests.

## LIST OF EXHIBITS

- |                 |  |
|-----------------|--|
| Exhibit DBH – 1 | Town of Burrillville Tax Assessor Map                              |
| Exhibit DBH – 2 | Google Map – Satellite Photograph of 200 Manley Drive, Pascoag, RI |

1 Q. Please state your full name and residence address.

2 A. David B. Harris, 200 Manley Drive, Pascoag, Rhode Island.

3 Q. Are you the owner of the property at that address?

4 A. Yes.

5 Q. Please describe the property that you own at 200 Manley Drive, Pascoag, RI.

6 A. It's located off of Wallum Lake Road and consists of two (2) lots - Lot 137-6, which is

7 approximately 62.5 acres, and Lot 121-17, which is approximately 5.7 acres. The area is

8 predominantly rural. My property has approximately 290 feet of frontage on Wallum

9 Lake Road almost directly across from the entrance to the proposed CREC facility. I

10 also have approximately 1000 feet of lake frontage on Wilson's Reservoir. My property

11 is located in a serene natural setting and offers an abundance of peace and tranquility,

12 which is a main reason why I purchased it.

13 Q. Attached hereto as Exhibit DBH - 1 is a map of Lot 137-6 and Lot 121-17 produced by

14 the Town of Burrillville Tax Assessor's office. Do you recognize the property depicted?

15 A. Yes, that is a fair and accurate depiction of the outlines of my property.

16 Q. Also attached hereto, as Exhibit DBH - 2, is a satellite photograph from Google Maps.

17 Do you recognize what it depicts?

18 A. Yes, this is also a fair and accurate depiction of my property from the air.

19 Q. When did you purchase this property?

20 A. I bought Lot 137-6 in April of 2004.

21 Q. What was the purchase price?

22 A. I bought the land for \$199,000.

23 Q. Do you reside on the property and, if so, with whom?

1 A. Yes, I reside there with my two (2) children. Shortly after purchasing the property, I  
2 built a 3 bedroom, 2.5 bath log cabin-style home on the property, which we  
3 currently live in.

4 Q. What is the square footage of your home?

5 A. Including the wrap-around deck on the house, it has an area of approximately 4700  
6 square feet.

7 Q. How much money did you invest in building your home?

8 A. Approximately \$200,000.00.

9 Q. What other improvements do you have on your property?

10 A. Several. I built a 3-bay garage that has approximately 2000 square feet of floor area.

11 Q. How much money did you invest in the construction of that garage?

12 A. That garage cost me approximately \$100,000.00.

13 Q. Any other improvements? If so, what?

14 A. Yes, I built another 2-car garage that has approximately 720 square feet of floor space,  
15 and that cost approximately \$50,000.00 to construct.

16 Q. Anything else?

17 A. Yes, I constructed a big barn that has approximately 2000 square feet of floor space and  
18 that cost approximately \$100,000.00 to construct.

19 Q. Anything else?

20 A. Yes, I constructed a horse barrel racing ring on the property and, with fencing, it cost  
21 approximately \$75,000.00 to construct. I have also expended tens of thousands of more  
22 dollars in landscaping and developing my property over the years.

23 Q. What is the current value of your property, as it presently exists?



1 A. It has been appraised at \$675,000.00, but only as a single family residence on "farmland".  
2 However, this property, with its size, location and lake front access is very unique and I  
3 believe it is worth at least twice that amount based on similar properties that I have  
4 researched recently in other municipalities. The fact is I couldn't find another  
5 property that has all of the unique qualities of my property.

6 Q. How do you currently use and enjoy your property?

7 A. Well, its home to me and my kids. We use it like any family would use their property.  
8 More specifically, we enjoy the rural character of the property. We take part in a number  
9 of recreational activities including, but not limited to, fishing, riding bikes and dirt bikes,  
10 playing sporting activities and the like. We entertain family and friends. It's also a place  
11 where we can relax and enjoy the bucolic environment and surroundings. I purchased  
12 this property in order to be away from the noise, pollution, traffic and volume of people  
13 associated with more suburban and urban areas. I also purchased it as an investment  
14 for my family's future.

15 Q. Can you explain what you mean by that last sentence?

16 A. This property is not only my primary residence but it's also my retirement plan. It was  
17 always my intention to not only live on the property but to also devote a large portion of  
18 it to the development of an equestrian campground and related commercial activities that  
19 would blend into the environment, such as horseback trail riding, a riding school and  
20 paddock, horse shows, camping, fishing, canoeing, kayaking and related outdoor  
21 activities. I also envision renting the property and facilities for weddings and other  
22 functions on the site in the future.

23 Q. Are you in a proper zoning district for those types of commercial uses?

1 A. Yes, according to the local planning and zoning officials, an equestrian campground and  
2 these related commercial activities are permitted as of right in this zoning district.

3 Q. How far along are you with these plans for a future commercial use of part of this  
4 property?

5 A. I have taken substantial steps and made substantial investments to implement my plans  
6 for an equestrian campground. First, I purchase Lot 121-17, which has 1000 feet of lake  
7 front access on Wilson's Reservoir, in 2010 for \$30,000.00. Next, I developed and  
8 implemented an extensive road and bridge system within the property for access to future  
9 over-sized camp sites. This process required oversight and approval from the RI  
10 Department of Environmental Management. The road system, including re-plantings as  
11 required by RI DEM, cost me approximately \$70,000.00. I have also incurred thousands  
12 of dollars in incidental expenses and expended countless hours and exhaustive efforts into  
13 creating and implementing the plans for this commercial endeavor.

14 Q. What is your expected date for completion of these commercial plans?

15 A. If everything goes according to plan, the equestrian campground could be a  
16 functioning commercial entity within the next year. However, if you came to my  
17 property right now you would see that the grounds are like a park right now and, as I said  
18 above, the road system, the lake access, the horse ring and barn are already in place. I  
19 invite the Board to personally tour the property.

20 Q. Are you familiar with Invenergy's proposal to construct and operate a proposed 850-1000  
21 megawatt electric generating facility commonly known as CREC.

22 A. Yes.

23 Q. Are you familiar where the proposed facility will be located?

1 A. Yes, right across the street from my property.

2 Q. Are you for or against the project?

3 A. I am 100% against the project.

4 Q. Why are you against this proposed project?

5 A. Many reasons. First, it will surely decrease the value of my property the moment the  
6 project is approved. The facility as proposed will bring a tremendous amount of noise,  
7 air pollution, water pollution and heavy truck traffic to the immediately surrounding area,  
8 both during construction and during the operation of the facility. I believe it will affect  
9 the health and safety of me, my family and my guests. It will be substantially detrimental  
10 to the aesthetic and recreational value of my property. And it will destroy the rural  
11 character of the area surrounding my property and will compromise all of the reasons and  
12 expectations that I had when purchasing and investing in this property. Also, I have  
13 made significant investments in this property for the future, as discussed above. The  
14 CREC facility will have a harmful and negative impact on not only my residential use  
15 and enjoyment of the property and the present value of the property, but also on the  
16 future commercial uses of the property. It will negatively affect the commercial revenue  
17 expected from this property on an annual and continuing basis, which I am relying upon  
18 for my retirement years and my family's future.

19 Q. Does that conclude your testimony?

20 A. Yes.

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## EXHIBIT DBH - 1



# Town of Burrillville -- Map-Lot 137-6

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Michelle Keach

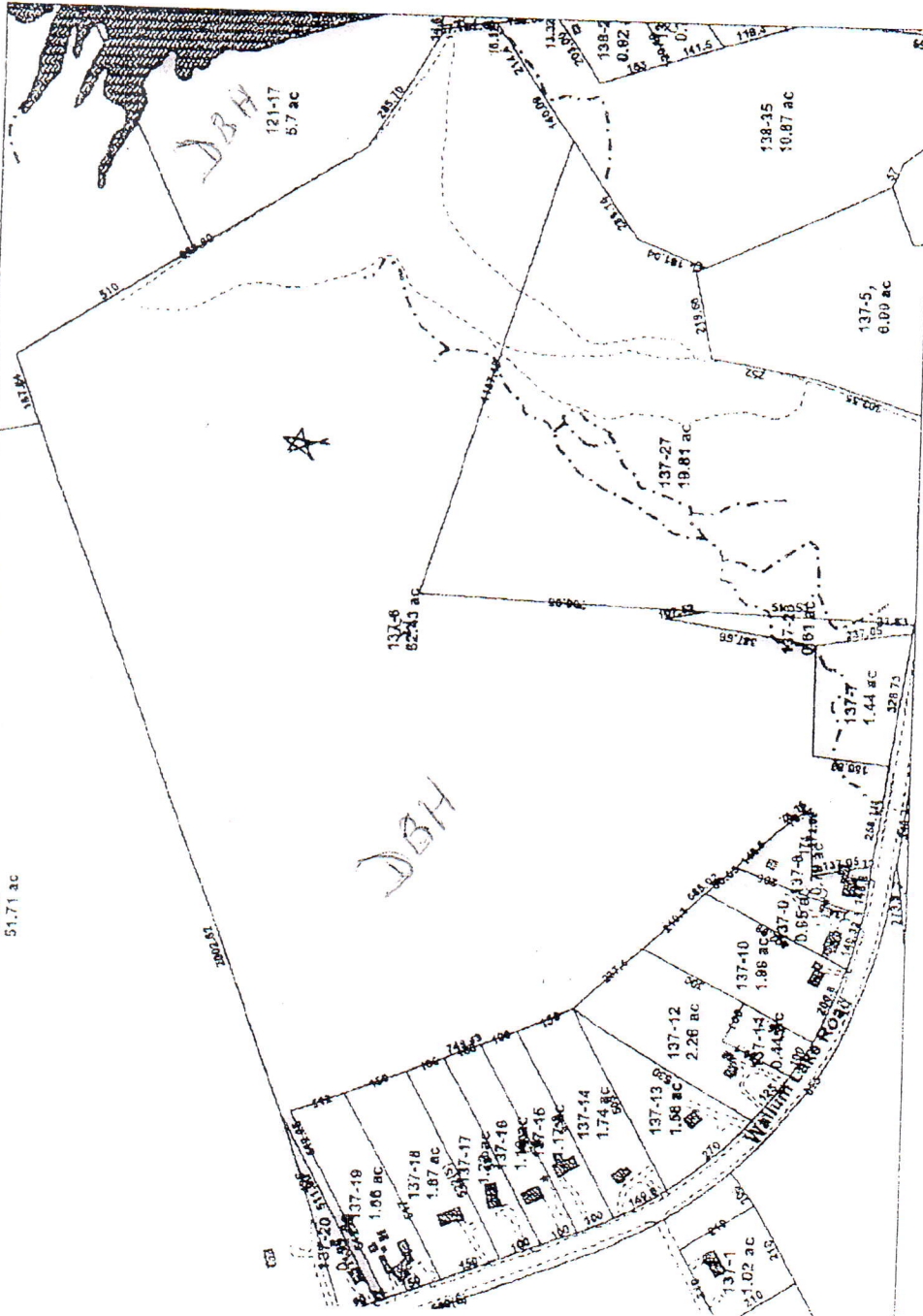
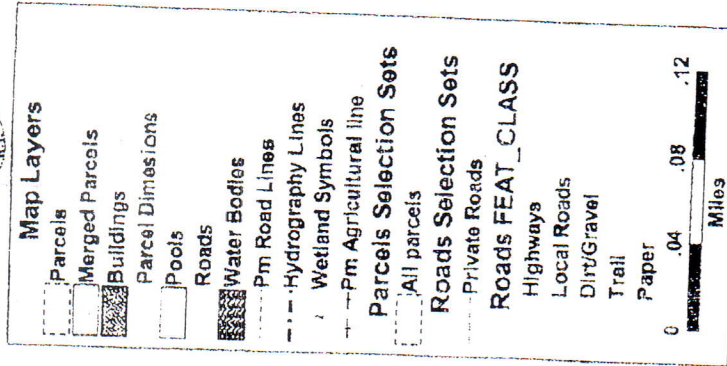
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Produced by Town of Burrillville, RI  
Office of the Assessor

This map is for conceptual planning purposes only.  
It is not valid for legal description or conveyance.



## EXHIBIT DBH - 2



# Google Maps 200 Manley Dr



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