



Burrillville Conservation Commission



105 Harrisville Main Street
Harrisville, Rhode Island 02830

August 1, 2016

State of Rhode Island
Public Utilities Commission
Energy Facilities Siting Board
89 Jefferson Boulevard
Warwick, RI 02888

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PUBLIC UTILITIES COMMISSION

**RE: RI SB 2015-06
Inveenergy Thermal Development, LLC.
Clear River Energy Center
Town of Burrillville, RI**

Honorable Siting Board,

The Burrillville Conservation Commission would like to bring to your attention the further need for evaluation of water resources and traffic impacts through the implementation of an Environmental Impact Study with respect to the proposed CREC.

During the week of July 25, 2016, Ocean State Power Facility stopped drafting process water from the Blackstone River in Woonsocket due to minimum river flows and the requirement to maintain 7Q10 river base flow. As such OSP started to draft reserve water from the Route 102 Holding Pond on the Burrillville/North Smithfield town line. On Thursday, July 28, 2016 OSP started hauling 8,000 gallon truckloads of water into the holding pond site to provide process water for continued operations.

During a traffic count for a half hour, PM Peak, 12 trucks accessing the facility was counted, which extrapolated over the course of a 10 hour day equates to almost 2 million gallons of water delivered. Given the recent lack of rain fall, 3"+ in the month of June and only 2"+ in July, available water resources have become a commodity. To further exacerbate OSP's demand for water to continue with their operations, third party water suppliers were trucking in water from sources still within the Blackstone River Valley Watershed (reaches within the Branch River), which should further be construed as a hindrance to maintaining required 7Q10 flows within the Blackstone River. There is no check/balance in place to ensure the power producers are acquiring water from legitimate sources.

The basis of creating this argument is that the CREC proposes to draft water from the Clear River aquifer, which is contributory to the Branch River, further contributory to the Blackstone River. CREC's proposal to draft 225,000 gallons of water per day in the summer months will intensify drought condition within the Blackstone River Watershed earlier in the summer months and require OSP to seek alternate sources of water for operations elsewhere, or possibly shut down. The Commission further purports the maintenance of 7Q10 flows in the Clear River needs to be closely calculated and reviewed to ensure the availability of water resources meet the demands of not only the project, but the Clear River sub-basin as well. In the event 7Q10 flows cannot be maintained in the Clear River sub-basin due to the current application's consideration, there is no alternate source of water indicated, which in the view of the Commission, is a fatal flaw within the application. Additionally, vehicular transport of

water into the CREC facility would also be a fatal flaw during summer months no one has yet considered or presented as testimony to the Board.

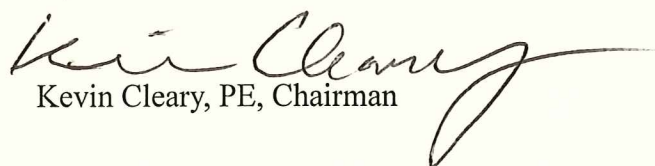
The Commission would also like to use this opportunity to inform the Board that the trucking of water to the OSP Holding Pond Facility, caused traffic delays on Route 102, even with a flagger present to assist turning movements of the 8,000 gallon tractor trailer units accessing the facility. With Route 102 having sufficient roadway geometry and lane capacity to accommodate such delays that were present, further consideration *must* be given to what *realistic* impacts truck traffic will have in Pascoag the applicant's traffic engineer simply does not capture or enter as testimony.

Given the number of trucks accessing the OSP facility on 7/28/2016 (estimated 240 trucks during the day delivering almost 2 million gallons of water) and using that as a basis of comparison to anticipate impacts to traffic in Pascoag, during winter months when the applicant may use diesel to energize CREC, roughly 85 trucks will need to pass through Pascoag's geometrically deficient roadway network to the access the facility each day, for up to 30-days (assumption is 85 trucks per day to recover 2,000,000 gallon AST to maintain 3 days of continuous operation with 8,000 gallon oil delivery trucks, for 30 days). Over the course of 30-days that would be 2,500 oil tankers through Pascoag, in the winter. The likelihood of an accident occurring during the winter on roads that are geometrically deficient logarithmically increases (Intersection of South Main St left to High St, Right turn from High St to Church St and two other significant horizontal curves on Church St, which all lack centerline turning radii for 53-ft trailer trucks). The figure above does not include Ammonia and Hydrogen Cell deliveries during this time additionally. The Board needs to appreciate the complexity, hazard and risk of being able to sustain this type of trucking operation to satisfy CREC's demand for backup fuel proposed on a roadway network that is not designed nor built to accommodate such a proposition and do so during winter weather.

Quite simply to propose this type of winter trucking operation through the streets of Pascoag flies in the face of common sense and conventional wisdom. CREC's application to setup shop in Burrillville is incompatible with sustenance of the available resources and places the health, safety and welfare of Burrillville's people and environment at high risk. Considering the items listed above the Burrillville Conservation Commission does not support the project. The Commission further maintains the previous position an Environmental Impact Statement must be rendered necessary to quantify all aspects of the proposal at this location.

Please accept this information from the Burrillville Conservation Commission as part of the public evidence on the matter and should you need additional information, please contact me at your convenience.

Respectfully submitted on behalf of the
Burrillville Conservation Commission


Kevin Cleary, PE, Chairman

Cc: Burrillville Town Council
RI Water Resources Board
Hon. Governor Gina Raimondo
U.S. Sen. Sheldon Whitehouse

Enclosures: digital disk with trucking photos & video dated 7/28/2016







