



Burrillville Land Trust
Protecting our open space and rural character
PO Box 506, Harrisville, Rhode Island 02830
(401) 447-1560 • e-mail: proseli@cox.net

September 21, 2016

Chairwoman Margaret Curran
Rhode Island Energy Facility Siting Board

Todd Anthony Bianco, Coordinator
RI Energy Facility Siting Board

Dear Chairwoman Curran,

EFSB committee members, my name is Paul Roselli - president of the Burrillville Land Trust. Tonight I will be speaking on behalf of the 212 acres that are owned by the land trust and in close proximity to the site of the potential fracked gas oil fired power plant known as the Invenergy project.

The land trust applauds the advisory opinion of the Rhode Island Department of Environmental Management. As one of the largest environmental groups in Rhode Island, RIDEM took an historical view writing in part that the site, and I quote, "This area is no less a priority then it was two decades prior."

Its important to dwell for a moment on that statement and go back in time to what that statement references. The reference came from a report generated by an Environmental Impact Statement conducted by the Federal Energy Regulatory Commission in July 1988. In that report Chris Raitel who helped write the EIS for FERC on Ocean State Power wrote, and I quote, "I would recommend that this Site No. 1 (i.e. Buck Hill) not be considered for this power plant project, not only because of close proximity to Dry Arm Brook, but also because of the potential impact on significant wildlife and plant species as well as recreation in this area. On the basis of what I know of these sites I have listed, this seems by far the most inappropriate location for a power plant"

Chris Raitel continues to work at RIDEM and in an email dated August 5, 2016, Mr. Raitel would not comment on the statement he wrote back in 1988. But in RIDEM's advisory opinion on page 37, the author states, "The proposed location of Facility and forest clearing in one of the largest remaining intact forests in the State will negatively impact area fish and wildlife, and bring additional stressors to area wildlife, State-listed or otherwise." This is very similar language. The land trust is asking the board to include as part of your research,

deliberations and findings the FERC EIS report from July 1988 - Docket number CP87-131-001 and CP87-132-001

Regarding the DEM advisory opinion, if you do a word search using the words “has not” or “had not” or “does not” in the DEM advisory opinion looking up information or applications or studies that have not been submitted by Invenergy, you find a total of 14 pieces of information that the applicant has not submitted to DEM for analysis. These 14 gaps take place on pages 6, 8, 9, 12, 15, 16, 18, 20, 21, and 22. The DEM advisory opinion is 39 pages in length. That means nearly 25% of the advisory opinion contains inadequate or missing information required for an analysis by DEM staff. Here are some examples :

- at the time of this Advisory Opinion the Applicant had not completed the design of the fuel oil piping, pumping and storage tank systems;
- As of the date, Invenergy has not supplemented its application with information regarding the source of its water supply;
- DEM has not received a wetland application relating to the Facility, the impacts of the Facility, as they relate to wetlands, are not fully known;
- the Applicant has not identified a water source for the Facility, hence there are no identified impacts of water withdrawal on the fish and wildlife habitats.
- the Applicant has not provided sufficient information to determine if the pools are supporting a sustainable amphibian population;
- the Applicant does not appear to have provided any plan sheet that depicts the extent of the security fencing;
- DEM does not believe there is sufficient evidence in the application to support the statement that "the project has already been designed to minimize impacts to forested habitat areas.

And there are more.

From these gaping holes with not sufficient or lacking information that is just not there, the land trust is petitioning RIDEM to construct an Environmental Impact Statement for the Invenergy project and all the other projects associated with the construction of this fracked gas oil fired power plant. As stated by the DEM advisory opinion, “The location of a Facility of this size and scope immediately adjacent to substantial acreage of State holdings of conservation land is not consistent with the conservation priorities that informed these state conservation plans.” Given the “size and scope” of this project, an EIS is the only instrument to fully evaluate the impacts and fill in the gaps and missing information provided by the applicant.

The Green Economy Bond Referendum rally scheduled for Tomorrow September 22 is slated to get statewide support for preserving agriculture and open space.

If you ignore the open space that is already preserved before going after new ones, you cast doubt on your goals and vision through DEM and Statewide Planning.

Breaking up a forest and dismantling decades of research and conservation planning for a short term bridge project is not what we need from you.

Thank you for your time.

Paul A. Roselli

President - Burrillville Land Trust

proselli@cox.net