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Friends of the Blackstone

John Marsland, President

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2016 AUG 12 AM 11:56
PUBLIC UTILITIES COMMISSION

Margaret Curran
Chair, Energy Facility Siting Board
89 Jefferson Blvd.
Warwick, RI 02888

July 27, 2016

Re: Invenergy's Clear River Energy Center

Dear Chairwoman Curran:

The Blackstone River Watershed Council/Friends of the Blackstone (BRWC/FOB) is a 501c3 corporation, designated by the Rhode Island Rivers Council to act on behalf of the Blackstone River, its tributaries and its watershed under Rule 2, Section 42-28-8 of the General Laws of Rhode Island. Our mission is to restore, enhance, and preserve the physical, historical, and cultural integrity of the Blackstone River, its watershed and its ecosystem, through public advocacy, education, recreation, stewardship and the promotion of our unique Blackstone Valley resource. As such, we take this opportunity to comment on the proposed facility to be constructed in Northwestern Rhode Island by Invenergy Thermal Development, LLC.

While much of the debate up to now has been framed as a struggle between the interests of the town and residents of Burrillville and those of the rest of the state, BRWC/FOB wishes to point out that the reality of the project is much more complex and much more widespread than that. *Siting that plant in Burrillville will have negative repercussions for the rest of the state, the bordering states of Connecticut and Massachusetts and the New England region as a whole.*

BRWC/FOB notes that the impact of additional emissions, from the initial drilling of fracked gas to the operation of the power plant itself (methane, CO₂ among many others), will be felt within a 50 kilometer radius of the plant that will affect not only Burrillville but neighboring Connecticut and Massachusetts and nearly all of Rhode Island as well. With respect to water, there are *concerns with both withdrawals and releases.* Remember, the proposed site for this power plant lies along Iron Mine Brook and Leland Brook which are both tributaries to the Clear River. And as you know, the Clear River is a tributary to the Blackstone River.

Local water supplies throughout the region are already strained by the low precipitation and drought conditions that are becoming more and more common in this era of higher temperatures. How much more depletion can they handle? Depleted aquifers and surface water can impact not only human life but the entirety of our ecosystem, in Northwestern Rhode Island and beyond to the outer reaches of the Blackstone Watershed. Releases of potentially contaminated and over-heated water from the plant into rivers and streams would exacerbate damage to wildlife and to the overall health of the region's waterways destroying many a cold water stream. The Blackstone River watershed, like others throughout the state, has long been considered historically stressed. The main stem and its tributaries have only recently begun to emerge from those disastrous conditions, as millions of dollars and many thousands of hours of paid and volunteer staff, invested in their restoration over the past 25 years, have begun to take effect. The thought of sacrificing what little contiguous forest land there is in a densely populated state is, in the opinion of the BRWC/FOB, appalling and insults all those in both state and non-profit sectors who have worked to preserve this area for nearly four decades.

The proposed challenges to Rhode Island's air and water are hardly small matters by many measures. They are already the subject of concern – and expense – by many of our federal and local government agencies and officials. Emissions have been identified worldwide as a major threat to our planet and the primary cause of climate change. In Rhode Island a well-informed group of dedicated individuals worked long and hard on the studies that resulted in the Resilient Rhode Island Act. The reduced emissions requirements of that act and public law, seen as beneficial to the whole state, would now be annulled by one single facility in Burrillville. The assault on our waters will have effects throughout the state. The Clear River, as already noted, is a tributary of the Blackstone which, in turn, flows into Narragansett Bay. Degradation of those waterways could very well have a negative impact on all the work and planning that is being and has already been done by those involved in statewide planning and the tourism and fishing industries, as well as by those who are planning to use the attraction of these natural resources to revitalize the state's economic future.

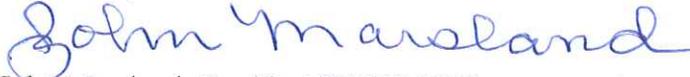
Chairwoman Curran, you may remember from your time on the boards of the Rhode Island Zoological Society, serving several terms as Chair, and the Rhode Island Audubon Society that the Blackstone River is a cornerstone to the health of our state and the health of our economy. The Blackstone River and the entire watershed for that matter, is one of the only sustainable economic forces in our state that increases in value over time. Always has. Always will. There will never be a time to decrease the value of the Blackstone River. This is certainly not a time to do so.

All of the above begs the question: TO WHAT END? There has been *no documented need* for such a facility in the state. New jobs? The figure being circulated is some 300 immediate construction jobs and a fraction of that number in permanent jobs. What will the *cost* of those “new jobs” be as measured by nullified emissions reduction, damage to the state's waterways and its consequences for tourism and fisheries? Can it really be argued that Rhode Island's appeal as a place that can attract new business will be

enhanced by this type of degradation or by the image of a state government working at cross purposes, one agency nullifying the work of others?

In view of the above, the Blackstone River Watershed Council/Friends of the Blackstone voices our opposition to the siting and permitting of a fracked gas/oil fired power plant in the northwestern corner of Rhode Island and implore you to deny Invenergy Thermal's application to build such a power plant.

Yours truly,



John Marsland, President BRWC/FOB

cc. Governor Gina Raimondo

Rhode Island Energy Facility Board

Rhode Island Department of Environmental Management

Rhode Island Statewide Planning

Burrillville Town Council, Planning and Zoning boards

Burrillville Land Trust