

...sizing L.  
...White, care is the r...

## CHARLESTOWN

# Water quality delays apartments' opening

By Christine Dunn  
Journal Staff Writer

**PROVIDENCE** — On Nov. 6, politicians and housing officials, including Sen. Jack Reed, gathered for a ribbon-cutting ceremony at Church Woods, Charleston's first affordable housing development for people age 55 and older.

But as winter approaches, the people who won a lottery to rent the 24 new apartments at Church Woods, located next to the Episcopal Church of the Holy Spirit on Old Post Road (Route 1A), are still waiting to move in.

A routine test of water quality for the certificate of occupancy recently found "high heterotrophic plate counts," a sign of potential bacterial contamination, according to Town Administrator Mark Stankiewicz and Town Council President Virginia Lee. Lee said that in 2014, before construction began, the water tests for the existing well on the site were fine.

The nonprofit Washington County Community Development Corp.'s \$6.3 million Church Woods development was built with financing from the Town of Charleston, a federal Hurricane Sandy disaster relief assistance and Building Homes Rhode Island, the state affordable-housing bond fund.

After the water test results came in, an investigation, which included sending a camera into the system, found a leak in the 50-year-old casing deep inside the well, and a new lining sleeve was installed. But test results completed after that remedy have still been unacceptable, although the counts have improved, according to Geoffrey Marchant, who formerly led the Washington County CDC. Marchant was involved in the start of the Church Woods development, and although he is no longer affiliated with the CDC, he said he has been keeping up to date with the situation.

"We're getting closer,"

said ~~Gery Bertrand~~, manager of the Washington County CDC. "We're just at the cusp of the [acceptable] level."

Marchant and Bertrand said the water system, which includes a well, two tanks and a distribution system, will be flushed, chlorinated and retested.

Stankiewicz explained that while all of rural Charlestown is served by well water, systems that serve 20 or more people are treated as public water supplies and are subject to regular testing. All 24 apartments at Church Woods are one-bedroom units, designed to house no more than two people.

Marchant said that Nov. 15 was the target move-in date for Church Woods residents, and tenants who had planned to leave their previous homes to move into Church Woods have been allowed to store their belongings there. He said he believes that tenants in this situation have been able to stay with family or friends until Church Woods

receives a certificate of occupancy.

Bertrand said some of the people who were selected to move into Church Woods had been homeless before the lottery was held, and they are staying in a motel "down the road."



Great Present for the Holidays!

**TOTO**  
Washlet Seat Sale  
**\$330**

Limit 1 per customer

- Our showroom features:
- Largest bathroom showroom in Rhode Island with over 7,000 sq. ft.
  - 543 faucets & shower systems
  - 180 vanities & mirrors, medicine cabinets
  - 131 kitchen and bathroom sinks
  - 38 tubs & showers & enclosures
  - 43 toilets featuring Toto Neorest
  - 359 lights & accessories

Other valid thru 12/31/2017. Inset price

1 Freeway Drive, Cranston, RI • 401.467.0200  
OTHER LOCATIONS: Plainville, Fall River & Hyannis, MA  
[bathspashshowroom.com](http://bathspashshowroom.com)

# HOLIDAY FUR & OUTERWEAR SALE!! NORTHEAST FURS LUXURY FURS AND OUTERWEAR

**DON'T WAIT**  
Many One-Of-A-Kind Items  
**NEW COATS, JACKETS,  
CAPES, VESTS, AND  
OUTERWEAR**

Be one of the first to select  
brand new collection of  
finest furs, cashmere and

685 Bldg Hill Road, Warwick, RI  
**(401) 287-7000 OR (877) 711-FURS**  
**Hours After Thanksgiving:**  
MONDAY - SATURDAY 10AM - 5:30PM  
SUNDAY 12 - 5PM | [northeastfurs.com](http://northeastfurs.com)

**Trade-Ins Are**  
Next to Han

*Green / Thank you Sam us*

# ENERGY FACILITY SITING BOARD PUBLIC HEARING

*on the Floor*

To show your  
support, call or write:

(401) 278-4402 or  
[info@clearriverenergycenter.com](mailto:info@clearriverenergycenter.com)

[CLEARRIVERENERGYCENTER.COM](http://CLEARRIVERENERGYCENTER.COM)

When: December 6, 2017

Where: Burrillville High School

425 East Avenue, Harrisville, RI

Time: 6 - 10 pm

Clear River Energy Pascoag  
Office - **OPENING SOON**

Paid for by Clear River Energy Center LLC

Invenery LLC  
P.O. Box 225  
Harrisville, RI 02830



8 / 6656 \*\*\*\*\*AUTO\*\*SCH 5-DIGIT 02814  
Current Resident  
300 Centennial St  
Pascoag, RI 02859-3305



*Mc Blomke Elm or post  
Seryn Has Element  
CLEAR RIVER ENERGY CENTER  
Pascoag RI  
CLEAR RIVER ENERGY CENTER*

# CLEAR RIVER ENERGY CENTER

## BRINGING \$100M IN NEW REVENUE TO BURRILLVILLE.

- ✓ Nearly \$100 million in tax revenue over 20 years, enough to cover the town's entire budget for first responders each year. \$1 million has already been paid to Burrillville.
- ✓ One of the town's largest taxpayers. Revenue equals more than \$4.8 million a year – which is 10% of the town's budget.
- ✓ Over 300 local construction jobs + 24 permanent, well-paying jobs.
- ✓ Millions in utility-bill savings to help mitigate and avoid future rate hikes.
- ✓ Will bring over 900 megawatts of clean, affordable and efficient energy.

Rendering of Clear River Energy Center driveway



**CLEAR RIVER**  
ENERGY CENTER

12-6-17 Jeannine Fortin

Burrillville RI

Welcome EFSB members. The state of RI welcomes you. All 33 towns and cities that are in opposition to Invenergy's Clear River Energy Center welcomes you!!

Invenergy, It is really disrespectful and totally insulting to the people of RI to be considered insignificant. Those 33 cities and towns that have opposed you will all have to put up with your chemical trucks, your ammonia trucks, highly explosive hydrogen, water trucks, diesel, cement trucks and all the mess of construction vehicles. Those 33 cities and towns are not insignificant. Those cities and towns opposed you on their own after learning the facts of this polluting power plant. We do not understand why you think you have more rights than the RI taxpayer and voters that pay to live, work and breathe in OUR state!!

RI belongs to us it is ours, you do not own it and that is what is being taken from us due to this ridiculous outdated process. Do you think campaign donations to Governor Raimondo gives you carte blanche?? Yes we know, we all know!!!

Enough is Enough!! RI has said "NO" We have put up with Invenergy's twisting of facts, and years of coverups and omissions. Why would you have to hide so much if this plant is so wonderful?? There are many water supply discrepancies, questionable wastewater plans and on and on and on!!

CREC has already been proven numerous times not needed at the ISO NE auctions. Those facts have been hidden also. Dont try to twist the facts, because we do not belong to that breakfast club!!

It has been proven environmentally harmful to that environment and a 30 mile radius in and around our state.

This new plant design has not even been proven. The figures of noise and water and pollution keep changing!

RI <sup>has</sup> have come through loud and clear "NO NEW POWER PLANT" RI already has one and that can't even be handled correctly.

CREC will ruin the socio economic fabric of RI and the northern part of the state. Its intrusion into the thousands of acres of recreation and conservation land will seriously impact this land use. The voters of RI spoke loudly when they voted for funding to buy this beautiful land full of biodiversity for conservation land. Who is going to want to hike, fish, camp and hunt near a loud obtrusive polluting power plant. The constant noise level, will be loudest especially during start up and shut down during very early morning and late at night! This is, and has been all along a very bad location for this plant. Why wasn't any other locations chosen as other projects have had to do??

This plant will cause unjust loss in the quality of life that we enjoy and have worked so hard for. Our rights are being stepped on. We have worked so hard for our homes and property that we cannot afford to lose. OUR way of life will be taken away all for corporate GREED!!

It has been proven CREC is not needed and we ask that you dismiss with prejudice.

Thank you

## SOLIDARITY

**On September 22, 2016** the Town of Burrillville adopted a resolution opposing the proposed CREC after conducting an extensive study through credentialed professionals, including the studies of noise, water, traffic and air quality among others

WHEREAS, after considering expert testimony and conducting thorough public hearings the Burrillville Planning Board and Zoning Board of Review have advised the EFSB that Burrillville, RI is not a suitable site for CREC and

WHEREAS the Burrillville Town Council joins with the citizens and officials of Burrillville expressing concerns and objections to the siting of CREC in Burrillville, RI

**From October 17, 2016 to the current time, 32 RI cities and towns, as well as Thompson Connecticut, Webster and Douglas Massachusetts, have adopted their own resolutions in opposition to the CREC proposed in Burrillville, RI**

**We feel their concerns and resolutions ARE relevant and important for you, the EFSB, to hear**

**WHEREAS 32 Cities and Towns in RI join with the citizens and officials of Burrillville as well as residents throughout the state of RI and neighboring communities in Massachusetts and Connecticut expressing concerns and objections to the siting of CREC in Burrillville, RI**

WHEREAS, many citizens of RI, as well as our neighboring communities in Massachusetts and Connecticut, have expressed clear opposition to

the siting of the CREC for reasons including the impacts on property, environment, water and

WHEREAS the Burrillville Building Inspector and Burrillville Tax Assessor have also submitted advisory opinions to the EFSB expressing the impact the CREC would have on the Town of Burrillville, and

WHEREAS the Town of Burrillville has filed 18 requests to Invenergy to identify a water source needed for cooling the plant and Invenergy has not yet named one and

WHEREAS John Marsland, President of the Blackstone River Watershed Council wrote that the “plant would threaten 25 years of restoration efforts and millions of dollars of investment by the state and nonprofits like BRWC and Friends of the Blackstone” and

WHEREAS according to the Blackstone River Watershed Council “emissions from the power plant, in particular methane and carbon dioxide, would affect a 30-mile area in the northwest corner of RI,” and

WHEREAS particulate matter would “diminish air quality, local rivers and watersheds would be stressed, additional deliveries of chemicals by large commercial vehicles would put residents at risk, noise pollution would increase and the biodiversity impacts and loss of wildlife habitats within the shared watershed would harm the regional environment” according to Burrillville Conservation Chairman Kevin Cleary, and

WHEREAS the Burrillville power plant would prevent RI from meeting a reduction in greenhouse gas emissions set by the 2014 Resilient RI Act, and

---

WHEREAS engineering firm Fuss & O'Neill advised that potential negative air quality and groundwater impacts are not worth any possible benefits from the power plant, and

WHEREAS numerous nonpartisan environmental groups, including the Environmental Council of RI, the Conservation Law Foundation, the Audubon Society of RI, the Nature Conservancy, the Cranston Conservation Commission, the Burrilville Land Trust, and the Blackstone River Watershed Council, along with the Blackstone Valley Tourism Council and numerous town councils have opposed the proposed power plant, and

~~\*~~ WHEREAS the proposed location is a F5 farming zone adjacent to state funded open space parks and this same location was found to be an inappropriate location for a power plant by RIDEM in 1988 when Ocean State Power included it in their application, and

WHEREAS the Cranston City Council has major concerns about the potentially catastrophic environmental, economic, and health impacts the CREC would have on Burrilville and the entire state of RI

WHEREAS the Town of Barrington has an interest in the controversy because the proposed utility intends to use water from a limited resource which is used for drinking water by the people of Barrington; and

WHEREAS the Town of Barrington supports the rights of local communities to have a say in what is built in those communities, particularly where such proposal will have significant impact on its citizens



(Providence)WHEREAS Invenergy's efforts to obtain water needed for the power plant met resistance and opposition for many months, with the Pascoag Utility District, Harrisville Fire District, and the City of Woonsocket rejecting proposals to provide water for the power plant, and

(Providence)WHEREAS On January 10<sup>th</sup>, the Town of Johnston approved a 20-year deal selling Invenergy water for the CREC and

(Providence)WHEREAS The Providence Water Supply Board is the wholesale supplier of water to the Town of Johnston which will be resold to Invenergy; and

(Providence)WHEREAS the agreement between the Town of Johnston and Invenergy obligates resources owned by the people of Providence without them having a choice or say in the matter; and

**BE IT FURTHER RESOLVED that as the democratically elected representatives of the people of Providence, the City Council does not support and hereby expresses serious concern over the use of water from the Providence Water Supply Board for the CREC**

**BE IT FURTHER RESOLVED that the Scituate Town Council President Charles Collin Jr, is hereby authorized to testify to the EFSB to express the opposition of the Town to the siting of the CREC in Burrillville, RI**

**BE IT FURTHER RESOLVED that these resolutions by Councils of North Smithfield, Lincoln, South Kingstown, Scituate, Hopkinton, Tiverton, Charlestown, Cranston, Exeter, Westerly, Jamestown, Narragansett, Little Compton, North Kingstown, Coventry, New Shoreham, West Greenwich, Pawtucket, Portsmouth, Bristol, Gloucester, Middletown, Richmond, Cumberland, Foster, Providence, Central Falls, Warren,**

**Barrington, West Warwick, East Providence be submitted to the EFSB for consideration during the hearings on Invenergy Thermal Development LLC's application to construct the CREC in Burrillville, RI**

**These resolutions we compiled for you tonight do have merit, these councils took time and care to review and access Invenergy's application for CREC. There was a common concern in each council meeting and that was the value of protecting this valuable wildlife habitat, environment, parks and recreational area. Ri has a lot vested in protecting our state forests and wildlife management areas. Although the EFSB has allowed Invenergy to exclude them from the final hearings, the resolutions of our cities and towns send a message loud and clear....Invenergy's CREC project will never be welcome by the majority of the citizens in the state of Ri.**

Public Testimony submitted by

Lynn Clark

Doug Jobling

12/6/2017

*RICHARD DIONNE  
230 BENEDICT RD - HANOVERVILLE, RI*

To date this has been a somewhat overlooked portion of Invenergy's application to the EFSB. I am referring to the most recent study performed by ESS for Invenergy entitled ESS Biological Inventory Report dated Aug 2, 2017 and the specific portion I am referring to is on page 70 of that document. In part this paragraph states, " A Compensatory Wetland Mitigation Plan in cooperation with resource agencies will be developed. Based on an inventory of parcels of conservation interest developed by RIDEM as well as a GIS overlay of elements in the RI Conservation Opportunities and local Assessors Maps. Invenergy has generated a CONFIDENTIAL comprehensive list of parcels potentially suitable for conservation. Invenergy is currently investigating the willingness of current land owners to sell property. Once completed, Invenergy intends to work with RIDEM and the Army Corps of Engineers to determine which parcel(s) appear best suited to offset project related wetland and other impacts. It is anticipated that the final mitigation package will primarily consist of land preservation and possibly some restoration should a viable project be identified."

In other words, what this section of the ESS Report says is that Invenergy is already in conversation with agencies such as RI DEM and the Army Corps of Engineers to find out just what it would take to offset any harmful or adverse impacts that the building of this project would have on the selected site. They're saying, hey we know we are going to do irreparable harm to the wildlife and conservation land adjacent to this plant BUT there must be some properties on DEM's wishlist that we could provide some form of compensation for acquisition. Well we, the Taxpayers of Burrillville and RI, are not interested in any of these often used negotiations to sacrifice one parcel of critical wildlife and conservation management property for another that could potentially be in another part of the State. Geo. Wash Management and Buck Hill Conservation Areas are NOT PAWNS IN YOUR GAME OF CHESS.

This is just one more example of Invenergy's reluctance to disclose details of the many negotiations they are involved with in their application process. Of course Invenergy's answer to this will be, "They always want more information from us. Everytime we give them information they always want more." Wah Wah Wah. If you gave us the necessary information in the first place, no one would have to ask for more.

(to the tune of) Jingle Bells Lyrics by Jan Very-Creamer

Jingle in Their Pockets-The Invenergy Song

(EVERYBODY SING on Chorus)

Jingle Bells

Rhode Island yells

Soon another year

Haven't all these hearings and

Our facts all made it clear

We beg you, give us all

A happy holiday!

Give us all no power plant

And please do it today!!

Dashing through the state

With way too many trucks

Icy roads and heavy loads

This scenario just sucks.

Ruining the roads, endangered people too,

Ruining those pristine lands,

We all say "how could you."?!



**Fair Shake**  
Environmental Legal Services

July 28, 2017

*Sent by Certified First Class U.S. Mail and email*

Jessup Borough  
Jessup Borough Building  
395 Lane Street  
Jessup, PA 18434  
JessupBorough@comcast.net

Re: Public Comment on Lackawanna Energy Center Proposed Revision to Jessup Borough Act 537 Plan to discharge industrial wastewater to Jessup Borough and Lackawanna River Basin Sewer Authority wastewater collection, conveyance, and treatment system

Dear Borough of Jessup:

This letter is a written comment prepared by Fair Shake Environmental Legal Services on behalf of Citizens for a Healthy Jessup, a nonprofit citizen-driven organization operating within Jessup Borough. Citizens for a Healthy Jessup ("CFHJ") supports the pursuit of personal, environmental, social and economic health for the people of Jessup and the surrounding area. CFHJ is hereby responding to the June 28, 2017 public notice of proposed Amendments to the Borough of Jessup's Act 537 Plan. While CFHJ supports Lackawanna Energy Center's ("LEC") abandonment of plans to discharge directly to Grassy Island Creek and the Lackawanna River, CFHJ is providing these comments based on substantial concerns that LEC's wastewater discharge may still have impacts on the community and CFHJ wants the Borough to be sure those impacts are addressed prior to any approval of the Act 537 Plan Amendments.

CFHJ is first and foremost frustrated by the failure of LEC and local government to bring about this proposal in a transparent and informed way. While the documents submitted along with the proposed 537 Amendments suggest that LEC and the Borough have been considering this option for months, it was only brought to the attention of the public after notice was provided for an insufficient 30 day public comment period. The proposal to discharge to the municipal system was not raised during the NPDES permitting process, or during the conditional use hearing where the public would have had an additional opportunity to raise concerns and see them addressed as necessary. The proposal has also not been raised during monthly reporting on construction process and it leaves citizens to wonder what other developments are being left out of those reports. Beyond the public involvement process, however, the major concerns for the public in any project of this type include: 1) whether sewer lines are in sufficient condition to convey the additional wastewater, 2) whether the municipal sewage treatment plant has available capacity and 3) whether the plant will be able to adequately treat the additional wastewater discharge.



In this case, the Lackawanna River Basin Sewer Authority ("LRBSA") has indicated that sufficient capacity is available. However, it seems that this conclusion is contingent on LEC proceeding with plans for maintenance and upgrades to the system. Ensuring there is sufficient conveyance and treatment capacity is prudent. CFHJ raises concerns, however, about the timeline for these upgrades and whether the upgrades will be completed prior to LEC's commencement of discharge. Per the November 14, 2016 Agreement between LEC and the Sewer Authority, LRBSA agreed to make efforts to ensure the Project would be complete by October 1, 2017. The proposed Resolution for Adoption, however, includes a September 1, 2017 date for commencement of the LEC discharge to the system. This discrepancy must be addressed before the application can be approved. Further, the project narrative fails to explain the basis for the 1,400 gpd sanitary sewer wastewater flows or how these figures were calculated. A conclusory statement is not sufficient, and in fact hampers meaningful public comment.

While LEC and the LRBSA have also indicated that pre-treatment limits will be met and LRBSA is capable of maintaining compliance with their own discharge requirements, there was not sufficient information provided for CFHJ to verify this on their own or provide meaningful public comment. No information was provided about what pollutants may be in the 56,600 gallons per day of industrial wastewater or what processes LEC will implement to meet pretreatment standards. There was simply no characterization of the wastewater discharge. The project narrative states that "[a]ll industrial wastewater discharge will meet the Municipal Industrial Pretreatment standards required by the wastewater treatment facility owned by the LRBSA." They fail, however to provide any support for this. Has LEC provided any detail of how they will meet those standards? Further, the Section H, Alternatives Analysis, asks the applicant to "[p]rovide a description of how the chosen method will provide compliance with effluent limitations." LEC responds with nothing more than a conclusory statement that "[t]he industrial wastewater will comply with all of the LRBSA's pretreatment effluent standards. This is simply an insufficient explanation. Without this information, the application is incomplete.

In addition to the main concerns raised above, the project narrative states that "[i]n the unlikely event that a process upset or other condition results in the generation of industrial wastewater that does not meet established standards, the wastewater can be trucked to a facility capable of handling the wastewater." While this may be true, it lacks necessary details for the public to be able to provide any meaningful comment. What is the likelihood that this would occur? Where is the facility that wastewater would be trucked to located? Does that facility have available capacity and can it meet effluent limits? Further information is required before this application can be deemed complete.

Finally, if the Borough intends to approve the 537 Plan Amendment, CFHJ would like to propose the following conditions be imposed:

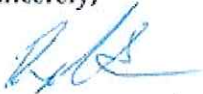
- First, LEC should be directed to plan for installation of a direct line to the treatment facility so that the public is not exposed to risk of impacts from potential backups of industrial wastewater in their residences. Alternatively, LEC could utilize the proposed residential line for the short term, but must plan, construct and implement use of a direct line within two years of the date of first operation, in order to protect

public health and safety. CFHJ would suggest an annual impact fee of \$500,000 until a direct line is established.

- Second, per the January 24, 2017 from Mr. Grizzanti of KBA Engineering to the Jessup Borough, "prior to the issuance of the Sanitary Sewer Connection Permit, all construction activities are to be in accordance with the Borough's ordinances and regulations." We cannot emphasize strongly enough, that all proposed sanitary sewer upgrades of the existing system along portions of S.R. 247 in the Borough must be completed prior to LEC's commencement of discharge to the system.
- Third, CFHJ requests that an assistance fund be established for community members who have not already installed a backflow preventer so that they will be able to apply for funds to do so.
- Fourth, CFHJ also recommends imposing an escalating fine for every gallon over 58,000 which LEC discharges to the system.

Finally, CFHJ recommends that the Borough hire independent outside consultants to verify the information contained in the proposed amendment materials. It is imperative that the Borough be fully informed about the costs and benefits of entering into the long term agreement with LEC. CFHJ requests that the Borough collect additional information and provide the public with an additional opportunity to comment on the proposed amendments. If the currently proposed amendments are ultimately approved by the Borough, we further request that these written comments be included with the Borough's submission to the DEP, so they may be addressed accordingly.

Sincerely,



Ryan E. Hamilton, Esq.  
*Counsel for Citizens for a Healthy Jessup*

EFSB Public Comment – December 6, 2017

By Betty Mencucci

ISO New England has stated that there isn't a need for this power plant and it has disqualified Invenergy from bidding in the auction in 2018. Doesn't that tell you something? The plant is not needed.

Last night I attended the hearing in Charlestown. Every person there spoke out against building the plant including town officials. The common message was that they received no details about the water plan in Charlestown and that the application should be dismissed. They don't know and we still don't know what the water plan consists of. Last night I asked Mr. Nilan to make sure he includes details of the water plan in his presentation tonight. Did you hear any details about their water plan. NO. Mr. Nilan refuses to divulge that information. Why can't this siting board tell Invenergy they must make it public?

Two years ago Invenergy held its first open house here in this building. I asked one of the representatives "Suppose nobody in Burrillville wants the plant to be built in this town, what will you do?" His answer to me, "We will go to another community and build it there where we are wanted and let them have the millions in tax money." Invenergy, this is what you said you would do, now keep your promise, GO HOME. You are morally corrupt. You are not needed, not wanted, not welcome, not ethical, not transparent and you would never be a good neighbor. You hide information, distort the facts and only say things to try to make us believe that the pollution won't hurt us, the noise won't bother us, the devastation of land won't affect us, that segmentation of the forest is no big deal, that trucking water across the entire length of the state is not ridiculous, that storing oil and ammonia and hydrogen gas couldn't create a catastrophe. You have no disaster plan, no water plan. This project is not thought out at all and should be dismissed.

There is no community that wants you. The green map speaks loud and clear and it is relevant!!! Enough is enough!



Well here we all are once a again.....Just when we thought we had made our final comments.....Invenergy has found a way to have us all come back and do this once again....to hear the details of their "infamous" water plan at yet another EFSB hearing. We had requested the water plan information many months ago....It is an insult to us that we have to lose another night of our life to accomadate this event.....AND guess what.....still no specific and solid details of that elusive water plan!

At the last hearing in Burrillville a proponent acused some of us of being emotional speakers....and suggested that such testimony was not relevant....I suspect I may be one of those emotional speakers ..... AND yes I am emotional to know we now have 3 cities and towns of RI, 2 from Mass. and one from Conn.....who stand with us against this power plant....WE cannot all be wrong!....I am emotional because of that term of Nimby ....it would seem that our back yard is quite big now with all of those cities and towns behind us...along with a whole global community who is fighting against projects just like this one.....WE have one world for everyone....that is what I call one huge backyard.

And I am emotional because of the mention the job factor which is always raised....I know how important jobs are....but these jobs are temporary....those who build this will move on to their next temporary job ..... their connection to Invenergy will be done..... for us the impacts from this project if sited will be "the rest of our lives"

The reason our families settled in Burrillville.....is that it is filled

with green space, conservation land, prime recreational space... beautiful lakes and forests...a magical place for children to play and grow... This is the place that dreams are made of! THIS is NOT the place for a mega power plant.... and DEM said so back in the eighties....This project has been proven to be not wanted and NOT needed. .... I implore the EFSB to take those facts into consideration and please remember our tiny community already has the largest power plant in RI.... ALL THIS you have heard before yet it bares repeating because as an emotional speaker this is my last chance to drive that point home....I leave you with this question....in your heart of hearts do you really think THIS is the place to site something so contrary to what we are trying to protect....Please deny this project and lets all get on with our lives!!

*Suzanne Dumas  
75 Manley Dr.  
Pascoag RD. 02859*

**Comments of David Brunetti**  
**935 Sherman Farm Road, Harrisville, RI 02830**  
**401-568-2559**  
**RI Energy Facilities Siting Board Public Hearing**  
**On the Proposed Invenergy Power Plant in Burrillville, RI**  
**Wednesday, December 6, 2017**

Members of the RI Energy Facilities Siting Board:

My name is David Brunetti, of Harrisville, RI.  
I am opposed to the construction of the proposed power plant and at this time my comments will be focused on the Environmental Impacts -specifically Habitat, Connectivity, and Biodiversity – matters which this Board is legally obligated to consider.

The information which I am presenting here includes excerpts of on-the-record testimony given to this board by Scott Comings of The Nature Conservancy for the Conservation Law Foundation.

“The environmental consequences of the proposed power plant on habitat are significantly negative and would cause unacceptable harm to the ecological integrity of the area. The effects include habitat fragmentation in a connected landscape. The direct impacts include but are not limited to deforestation, light pollution, noise pollution, and runoff.”

“Should this proposed development take place, it would dramatically increase fragmentation and light pollution causing a barrier in this critical wildlife corridor.”

“Resilient and healthy ecological systems need to be connected. The siting of the proposed development is in a particularly important location for ecological flow both within the state and region.”

“Species such as the black-throated blue warbler are interior forest species indicative of a lack of disturbance. This type of habitat and its associated species would be impacted very negatively by the proposed development.”

With the recently completed and updated biological survey, we can now say that it is clearly evident that seventeen state-listed species, as well as forty-seven Species of Greatest Conservation Need, would be negatively impacted.

*including the state endangered Cerulean Warbler*

“Unfragmented forests such as those found in this Borderlands Landscape are rare in this coastal region. Fragmentation of critical high concentration flow areas will have severe impacts on the ability of the ecological system to function and adapt.”

Overall, the development of this power plant, which has been proven by ISO New England and the market to not be necessary, “would undermine the state’s ability to achieve its

greenhouse gas reduction goals, and would result in unacceptable local environmental impacts.”

“Siting the proposed power plant in this critical connecting corridor within this regionally significant forest landscape would undermine decades of coordinated conservation strategies and result in unacceptable harm to the environment.”

“The creation of impervious surfaces, noise [pollution], light pollution, wetland[s] destruction, deforestation, and other effects of the proposed power plant would break up this currently unfragmented habitat and eliminate an irreplaceable wildlife corridor.”

“In the context of our changing climate, the proposed power plant would cut off the unique connectivity of habitat that is essential to allow ecological systems to function and adapt.”

Because the Energy Facility Siting Board is only allowed to grant a license in the circumstance that an applicant has shown that “the proposed facility will not cause unacceptable harm to the environment”, which is clearly not the case here, I strongly urge the Board to reject Invenenergy’s application for the proposed Clear River Energy Center.

Thank you for the opportunity to provide you with my comments.

Sincerely,

A handwritten signature in black ink, appearing to read "David A. Brunetti". The signature is fluid and cursive, with a large initial "D" and "B".

David A. Brunetti

## Diesel Exhaust and Public Health

I would like to talk about the additional truck traffic that will be brought to our local environment. Additional truck traffic that will result from the delivery of water to the proposed power plant site in Burrillville.

Although progress has been made in the past decade, in reducing exposure to diesel exhaust, diesel exhaust still poses a substantial risk to public health and the environment.

The International agency for research on Cancer, classified diesel exhaust as carcinogenic to humans based on sufficient evidence that exposure, is associated with increased risk for lung cancer.

If the Clear River Energy Center moves forward to fruition in Burrillville, the diesel fueled truck traffic will increase by thousands of additional trucks per month.....

The trucks will be traveling on an already heavily traveled, congested route to and from the site.

The route is highly populated, consisting of homes and businesses along route 44, through Smithfield, Greenville,

Glocester and Burrillville. The most congested area is Route 44 in Smithfield.

What about a traffic study?

Invenergy did a traffic study/report.

However, they did not talk about the residents or the businesses.

Invenergy was only concerned about the traffic impacts of the diesel trucks and the width of the roads in Pascoag.

Along the route are 8 schools and pre-schools with approximately 1197 children, 7 nursing homes with approximately 700 senior residents, 9 working farms that grow fruits, vegetables and chickens!

Anyone who has traveled this route knows about the narrow roads.

On any given day, you will see people walking and children playing along the roads, especially in the villages of Chepachet and Pascoag.

Long term exposure to diesel exhaust can cause chronic respiratory symptoms such as persistent cough, bronchitis, reduced lung capacity and kidney damage.

Children and adults with asthma, emphysema, heart disease and or allergies, are especially susceptible, and the long term exposure to diesel exhaust can cause symptoms to worsen.

Children and the elderly are the ones to be affected the most.

Diesel particulate matter is composed of carbon particles called soot or black carbon.

The soot is comprised of numerous organic compounds that include:

Polycyclic aromatic hydrocarbons, Benzene, Formaldehyde, Acrolein, and Butadiene.....just to name a few.

All of these are known triggers towards the burden of cancer.

The majority of the particulate matter from diesel fumes is small enough to be inhaled into the deepest regions of our lungs.

This is where the lungs are most susceptible to damage; again, children are most vulnerable.

The diesel fumes will be in the air that we breath, it will be in the soil of our gardens and the water that we drink!

According to the World Health Organization, It has been reported that diesel exhaust is more carcinogenic than second hand smoke from cigarettes.

The report goes further to state that diesel exhaust belongs in the same deadly category as asbestos, arsenic and mustard gas.

Lung cancer is the major cancer attributed to breathing in diesel exhaust.

Diesel exhaust is a major part of outdoor air pollution to date.

Why should Burrillville, the surrounding communities and the planet, be placed at further risk for ill health?

This is not the time to even consider a new power plant that experts tell us is not needed! A power plant that will set us back 40 years.....

Enough is enough!

Rhoda-Ann Northrup

85 summit Drive

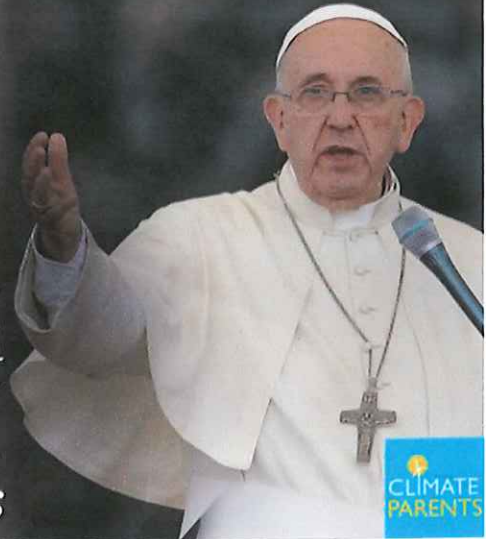
Cranston, R.I. 02920



# IT WOULD BE SAD

*and dare I say even catastrophic,*  
were special interests to prevail  
**over the common good**  
and lead to manipulating  
*information in order to protect*  
their own plans and interests.

*-Pope Francis*



Dear Friends, If there was ever ANY doubt that this company, Invenergy, is not transparent and still has an incomplete application with NO truthful details about water, then last night should have signed, sealed and delivered their fate. Didn't we go there to hear the water deal? Did anyone hear it?

They have no water plan. Johnston's water deal is in Superior Court.

Fall River water deal was done without the knowledge of the city council or the people. Pretty shady. WHO DOES THAT?

Apparently that is exactly how Invenergy does business because the town council from Charlestown heard about it in a ProJo article two months ago and have received NO complete documentation ....they actually used the words "incomplete proposal" last night. Vague, ambiguous, changing... Where have you heard those words before? Only from the town of Burrillville for the last 2 years. And from the Conservation Law Foundation over the same time period. You are all reading the same proposal...assuming that it isn't redacted to oblivion... What will it take for the EFSB to dismiss this case with prejudice? You have been reading an incomplete proposal and one that changes radically with every meeting!

The Narragansett water deal was made with a former chief sachem who now lives in Florida. There has been no tribal decision on this deal. There is no deal.

Everything else has been said over and over and over again. Conservation area, threatened and rare species, rural way of life, noise pollution, air pollution, Waste water pollution, country roads, future generations THE WILL OF THE PEOPLE!! This is Dinosaur technology tying us to fossil fuels at the very moment we should be ramping up against catastrophic climate change!

The words ludicrous, ridiculous, unicorn story and not telling the truth were also said last night. And you surely saw that Charlestown residents are as well informed as Burrillville residents and all of us who live in between. We do not want this Power Plant.

*Sister Mary Pendugast, RSM*

Here we are again at your table pleading our case against CREC. Invenenergy and their Associates, have long been not only at your table but more importantly at your ear. The fossil industry has had these positions since the law creating this "trusted process" was conceived. The EFSB law was created by well-paid lobbyist and politicians. This law gives you three the right to allow this nightmare to proceed while ignoring the cries of B'villians and many others who are concerned about the corruption witnessed during these past few years. Case in point the water issue. Backroom deals abound.

This law affords you the right to ignore the effects of alternatives on the question of the necessity of this fracked gas power generator. CREC has a 20-30 year life. Why go forward with this when solar, wind and efficiency are on a rapid rise?

The following is an incomplete list of the ramifications should you choose to green light CREC.

- 1) This board will be supporting the fracked gas industry. This industry has it seem a total disregard for all we the opponents hold dear i.e. clean air, abundant water, a sustainable climate, fragile ecosystems and the earth itself that we all live on.
- 2) You would be condoning the corrupt process that has afforded the industry every opportunity to change the rules of this process, while we the opposition have been repeatedly denied such largess.
- 3) The blinding influence of money and power has taken over this board's sight, maybe not total blindness but a least shortsightedness that will allow harm to, they say, seven generations to come. Your grandchildren's grandchildren. Not to mention the impression you would be leaving these little ones. What will the children take away from this "trusted corrupt process"?

In closing I plead to you Margret, Janet and Parag to open your eyes and see us, to open your ears and hear us and to open your heart, humanity and conscience to a future filled with alternatives and not allow this flailing desperate industry to go forward. Join us it is not too late. Save B'ville. No New Power plants.



# KEEP RHODE ISLAND

# Beautiful

## NO NEW BURRILLVILLE POWER PLANT!

In addition to thousands of citizens who have signed the petition against the Clear River Energy Center power plant proposed for Burrillville, RI a growing number of major organizations, groups, towns, and leaders from Rhode Island and surrounding states have joined in expressing their opposition and concern through various forums. We will work to keep this running list up to date. Visit [www.keeprhodeislandbeautiful.com](http://www.keeprhodeislandbeautiful.com) for more info and to get the latest up to date list.

### Opposition to the proposed Clear River Energy Center (as of October 29, 2017)

1. Alan Shawn Feinstein Foundation
2. Audubon Society of Rhode Island
3. BASE (Burrillville Against Spectra Energy)
4. Blackstone River Valley National Heritage Corridor
5. Blackstone Valley Tourism Council
6. Bell Street Chapel
7. Burrillville Conservation Commission
8. Burrillville Democratic Party
9. Burrillville Historical Society
10. Burrillville Land Trust
11. Burrillville Planning Board
12. Burrillville Town Council
13. Burrillville Zoning Board
14. Cumberland Conservation Commission
15. Clean Water Action – Rhode Island
16. Conservation Law Foundation
17. Environment Council of Rhode Island
18. FANG (Fighting Against Natural Gas)
19. Food and Water Watch
20. Fossil Free RI
21. Harrisville Fire District
22. Indivisible Rhode Island
23. Interfaith Power & Light
24. Keep Rhode Island Beautiful
25. Lincoln D. Chafee, former mayor of Warwick, RI, former Rhode Island Governor, former United States Senator
26. Manville Sportsmen's Rod and Gun Club
27. Massachusetts State Senator Ryan C. Fattman
28. Mayor Allan Fung, Mayor of Cranston, Rhode Island
29. Metacomet Land Trust
30. Northwest Rhode Island Supporters of Open Space
31. Our Revolution –RI Chapter
32. Pascoag Utility District
33. Providence Gardner
34. Providence Mayor Jorge Elorza
35. Rhode Island Association of Conservation Commissions
36. Rhode Island Progressive Democrats
37. Rhode Island State Nurses Association
38. Rhode Island State Rep. Aaron Regunberg
39. Rhode Island State Rep. Bobby Nardolillo
40. Rhode Island State Rep. Cale Keable
41. Rhode Island State Rep. Robert B. Lancia
42. Rhode Island State Senator Jeanine Calkin
43. Rhode Island State Senator Paul Fogarty
44. Rhode Island Student Climate Coalition
45. Save the Bay
46. Sierra Club – Rhode Island Chapter
47. Sisters of Mercy RI
48. South Kingstown Conservation Commission
49. The Blackstone River Watershed Council/Friends of the Blackstone
50. The Environmental Justice League of Rhode Island
51. The Last Green Valley
52. The Mashapaug Nahaganset Tribe
53. The Nature Conservancy in Rhode Island
54. The Rhode Island Chapter of Citizens Climate Lobby
55. Thompson, CT Conservation Commission
56. Toxics Action Center
57. West Greenwich Conservation Commission

### **Cities & Towns**

58. City of Central Falls, RI
59. City of Cranston, RI
60. City of East Providence, RI
61. City of Pawtucket, RI
62. City of Providence, RI
63. Town of Barrington, RI
64. Town of Bristol, RI
65. Town of Burrillville, RI
66. Town of Charleston, RI
67. Town of Coventry, RI
68. Town of Cumberland, RI
69. Town of Douglas, MA
70. Town of Exeter, RI
71. Town of Foster, RI
72. Town of Glocester, RI
73. Town of Hopkinton, RI
74. Town of Jamestown, RI
75. Town of Lincoln, RI
76. Town of Little Compton, RI
77. Town of Middletown, RI
78. Town of Narragansett, RI
79. Town of New Shoreham, RI
80. Town of North Kingstown, RI
81. Town of North Smithfield, RI
82. Town of Portsmouth, RI
83. Town of Richmond, RI
84. Town of Scituate, RI
85. Town of South Kingstown, RI
86. Town of Thompson, CT
87. Town of Tiverton, RI
88. Town of Webster, MA
89. Town of Westerly, RI
90. Town of Warren, RI
91. Town of West Greenwich, RI
92. Town of West Warwick, RI



**Blackstone  
Heritage  
Corridor, Inc.**

Mr. Todd Bianco  
Coordinator  
Energy Facility Siting Board  
89 Jefferson Blvd.  
Warwick, RI 02888

August 25, 2016

RE: SB 2015-06 Invenergy Thermal Development LLC's Application to Construct the Clear River Energy Center Power Plant in Burrillville, RI.

Dear Mr. Bianco:

There is a proposal before the EFS Board relative to authorizing construction of a roughly 67-acre energy production facility off of Wallum Lake Road in Burrillville.

Blackstone Heritage Corridor, Inc. is writing to express its position that the project may have the potential for significant adverse impacts to the resources of the federally-designated John H. Chafee Blackstone River Valley National Heritage Corridor.

**Authority:**

The John H. Chafee Blackstone River Valley National Heritage Corridor was established by an Act of Congress in 1986. That U.S. Public Law, 99-647, in Section 9, obligated the Corridor to review and comment on a variety of projects by providing the following:

“Any federal entity conducting or supporting activities directly affecting the Corridor *shall*-

- 1) *Consult with* the Secretary and *the Commission* with respect to such activities,
- 2) *Cooperate with* the Secretary and *the Commission* in carrying out their duties under this Act and, to the maximum extent practicable, coordinate such activities with the carrying out of such duties; and
- 3) To the maximum extent practicable, *conduct or support* such activities in a manner which *the Commission* determines will not have an adverse effect on the Corridor.”

(Emphasis added)

In 2014, U.S. Public Law 113-291 was adopted. The law established the Blackstone River Valley National Historical Park. In section 3052, it also provided that the BHC would perform the functions previously performed by the Commission.

“For purposes of (99-647 Section 9), a reference to the “Commission” shall be considered to be a reference to the local coordinating entity.”

Blackstone Heritage Corridor, Inc. (BHC) is the designated local coordinating entity for the John H. Chafee Blackstone River Valley National Heritage Corridor.

### **Scope of Review:**

The property is located in Burrillville, RI. Therefore, the project site is located within the John H. Chafee Blackstone River Valley National Heritage Corridor.

BHC works with community partners to preserve and promote the Valley's historic, cultural, natural and recreational resources for current and future generations.

The BHC Strategic Plan identifies a number of elements related to this project. While not exhaustive, our plan describes several objectives which relate to this application and which are identified in no particular order below:

#### Environmental Stewardship

- Promote stewardship, including a culture and ethic of long term care for our natural resources.

#### Land Use

- Promote new development that is compatible with the traditions and character of the region, does not adversely impact natural and cultural resources, avoids fragmentation of resource and animal corridors, provides a variety of residential housing options, and minimizes sprawl.
- Identify and protect important natural and cultural resources from adverse development impacts
- Promote and facilitate open space planning and implementation to preserve important natural and cultural resources, working lands, and recreational opportunities.
- Promote the designation and enhancement of scenic roads and views, greenways and blueways.
- Promote conservation and development techniques and policies that protect water quality and supply.
- Encourage regional planning to protect shared natural and cultural resources and promote intercommunity cooperation.

#### Air

- Protect forest resources, which absorb and filter air pollutants, generate oxygen, store great quantities of carbon, and help maintain the necessary balance of air components.

- Encourage land use planning and design that will lower harmful emissions and prevent air quality degradation.
- Protect fish and wildlife habitats from air pollutants.
- Encourage the development and use of renewable energy.

#### Water

- Reduce and eliminate point and non-point source pollution to preserve and enhance the quality of the region's surface and ground waters.
- Facilitate informed decisions regarding alterations of the natural flow of water across the landscape to safeguard surface water flows and ground-water recharge.
- Support opportunities to remediate legacy sediment contamination within the watershed.
- Support resiliency efforts to protect against the effects of climate change.
- Promote watershed-wide low impact development practices, appropriate revision of bylaws and regulations, and enforcement of regulatory tools for improved storm water management and water quality protection
- Ensure adequate supplies of water that will balance the needs of human, wildlife and plant life populations.
- Encourage residents to understand the interrelationships of human activities and water quality and quantity through education and outreach.

#### Wildlife

- Protect wildlife habitats, including unfragmented forest, grasslands, successional habitats, freshwater wetlands, streams, ponds, lakes, rivers and estuarine habitats, capable of supporting native wildlife species.
- Protect and promote corridors that link critical habitats and minimize habitat fragmentation.
- Improve and restore degraded aquatic and terrestrial habitats.
- Protect large blocks of unfragmented forestland and implement appropriate forest management.
- Promote safe and convenient water access and water trails for boating, paddling, fishing, swimming, skating, and simply enjoying the natural beauty of the region's lakes, streams, and rivers.
- Foster economic development activities that promote outdoor, nature-based recreation.

#### **Discussion:**

The site is located in perhaps the most natural and forested area of Rhode Island, and is just a mile or so from two additional states (Connecticut, Massachusetts).

Located in the Town of Burrillville, RI, it is situated within the John H. Chafee Blackstone River Valley National Heritage Corridor. Topographically, it lies near the western boundary of the Blackstone River Watershed. The site drains to the Clear River which in turn flows to the Branch River, a primary tributary of the Blackstone River.

Areas to the north, south and west of the property include large tracts of permanently protected open space.

The current proposal is part of a collection of proposals including expansion of the existing compressor and utility corridor work, and indicates that collectively as much as 121 acres of land to be cleared for the primary activity. While this particular project involves a (significant) portion of the impacts, the 3 projects are interrelated and their impacts should be evaluated in the collective.

The project expects to require up to 925,000 gallons of water per day (gpd) for its operations. Discharge is planned to the municipal wastewater treatment system. The water would be drawn from as-yet-unidentified sources and removed from the ecosystem for treatment.

After construction, which will certainly be accomplished by moving goods and equipment on minor rural roads, delivery of fuels, chemicals and other supplies will be made via large tanker style trucks to the site.

1. Environmental Stewardship

Blackstone Heritage Corridor, Inc. embraces and encourages stewardship of the Valley's resources. It is through such thoughtful effort to protect natural resources that those resources remain available to support the region's environmental health for future generations. The extensive elimination of forest and impact to water sources will permanently impact the ability of the land to benefit the Town of Burrillville, the "Quiet Corner" of northeastern Connecticut, the nearby region of Massachusetts, and the Blackstone River Valley National Heritage Corridor.

BHC requests information be provided indicating that these resources will be protected and stewarded for current and future generations.

2. Land Use

According to maps available from the USDA, the project site is nearly entirely compromised of (>80%) hardwood deciduous forests and areas of softwood and mixed forests, as is much of the land in this portion of the watershed and National Heritage Corridor. The soils are predominantly hydric, with seasonal high water tables, and there are areas with slope and/or bedrock constraints.

As noted elsewhere in this letter, there has been no material provided to BHC that indicates the project will conserve or protect water quality and supply, provide open space and recreational opportunities or protect natural resources from adverse development impacts.

Where the project is located in the very northwestern portion of Rhode Island, there has been no information provided to demonstrate coordinated review with nearby Massachusetts and Connecticut; such review should include discussion of existing and anticipated development projects and assessment of various natural and economic resources. These evaluations should also demonstrate inter-municipal and inter-state coordination and, as noted previously, should consider the various projects in a coordinated and cumulative fashion.



Existing forest resources have extraordinary value relative to intercepting stormwater and thereby attenuating stormwater impacts. Given the expanse of anticipated forest removal for this project as well as the acres of filling and alteration of wetlands and areas of hydric soils, we can expect millions of gallons of additional stormwater will be introduced to the wetlands and water systems associated with the Clear River. Clearing additional land in order to construct stormwater basins addresses only a portion of the issue and typically creates additional issues such as time and duration of flows, as well as appropriate recharge. The consequences of such significant additional stormwater flow cannot be overstated.

Trucking delivery is by way of State Route 100, classified as a Minor Arterial roadway, and a portion of Wallum Lake Road that is classified as a Major Collector roadway. Other nearby roads which may ultimately receive such traffic include two Minor Collector roadways; Buck Hill Road and Jackson Schoolhouse Road. According to Google Maps, Buck Hill Road is the suggested route between the site and Interstate 395. Providence is best accessed, also according to Google Maps, through small villages and towns. Both the volume of trucking and the material being transported present risk on a number of levels. It is unclear what if any measures are proposed to ensure the integrity of the resources of the Blackstone River Valley and the National Heritage Corridor.

BHC understands that an archaeological survey and an archaeological site examination have been performed. However, BHC has not had the benefit of review of those materials. Given the vast area of anticipated disturbance, such a survey will be helpful to BHC's effort to determine whether the project will have a significant adverse impact on those resources.

BHC requests information to demonstrate that there will be no significant impact upon the resources of the National Heritage Corridor with respect to trucking/traffic/roadway impacts, stormwater, loss of forest canopy, alteration of soils, floodplains, and the surface water systems leading to the Blackstone River.

3. Air

Carbon dioxide is naturally captured from the atmosphere through biological, chemical, or physical processes. One acre of forest can store more than 35 megatons of carbon, and can filter more than 2.5 megatons of carbon dioxide. Given the extensive removal of forest vegetation required for the collective projects as described above, BHC has concerns about the adverse impact of the proposal with regard to air quality and carbon sequestration.

BHC requests further information to demonstrate provision for carbon sequestration sufficient to reflect the loss of forest resources performing natural carbon sequestration.

4. Water

The project indicates up to 925,000 gpd may be needed at the facility. It is important that projects maintain a balance of water resources. Removing large quantities of water from the ecosystem is a concern; discharging large quantities of water to a wastewater treatment facility is also a concern since it results in

increased and mechanical discharges into other sub-basins, leaving the original sub-basin from which the water came still without that quantity.

Concerns related to management of stormwater are identified above. Significantly altering the natural balance of water in aquifers or ponds can result in atypical movement of contaminants. Maintaining adequate hydrology is essential to ensure that new channels do not open for historic contamination to shift or even for naturally-occurring elements to surface.

Given the region's reliance on groundwater and surface water systems, this project constitutes an extraordinary tax upon the region's resources. We note that the current year has seen very little rainfall compared with about 52 inches/year typical (USClimateData.com), so natural water systems are challenged. Withdrawing an additional 925,000 gpd from groundwater even over a short period of time poses significant threats to the drinking water systems, soil health, vegetative health and community health. Removing the water from the area further compromises the recharge opportunities, exacerbating drought conditions. This in turn also raises wild fire risk, and increases the threats in a forested area not well-served by municipal water supplies.

BHC requests that information be provided to ensure that the impact to ground- and surface- water resources will not permanently impact the region and threaten the health of the National Heritage Corridor ecosystems.

#### 5. Wildlife

As previously described, more than 100 acres of existing forest is expected to be cleared for this project and those appurtenant with it, and existing rainwater flows will be inextricably altered. Even providing culverts for wildlife passage, the concern is that entire habitat regions will be severely restricted or even eliminated.

In addition to the disruption of stormwater management, carbon management, and water recharge, it is unclear what the impact will be on the natural existence of and migration patterns for local wildlife. The site is located in a predominant north / south wildlife corridor between, generally, the Douglas (MA) State Forest, protected lands in the northeastern portion of Connecticut and the protected and managed lands of the Scituate Reservoir. This miles-long corridor is a regional critical habitat and ecosystem.

Preserving largescale land areas that are currently not protected and which would create corridors appropriate for wildlife travel and habitat could be an opportunity to offset the obvious first-tier impacts of the proposed development. Because the project is located at the edge of the watershed, this of course presents additional challenges.

BHC requests additional information to demonstrate that there will be no significant adverse impacts upon the wildlife corridor resources of the National Heritage Corridor.

**Summary:**

The project proponent has indicated that a number of these items could be further analyzed in later permit review stages, after EFSB approval is attained. However, these items and their impacts are integral to whether this project (as well as the appurtenant elements whose potential impacts have thus far been omitted from review) is being appropriately sited. Significant additional information demonstrating the long-term integrity of the region is required. Blackstone Heritage Corridor, Inc. is unable at this time to indicate that the project will not have significant adverse impacts upon the resources of the Congressionally-designated and nationally-significant John H. Chafee Blackstone River Valley National Heritage Corridor.

These comments are provided pursuant to responsibilities as described by Public Law 99-647 as amended most recently by Public Law 113-291. Please feel free to contact BHC's deputy director and community planner with any additional questions.

Yours truly,



Megan T. DiPrete, AICP  
Deputy Director

**Certificate of Service**

I hereby certify that on August 26, 2016, I sent a true copy of the preceding to the Energy Facilities Siting Board via hand delivery and electronic mail, and to the parties on the attached service list via electronic mail.



Megan T. DiPrete

BLACKSTONE VALLEY TOURISM COUNCIL  
BOARD OF DIRECTORS

POSITION STATEMENT – PROPOSED BURRILLVILLE POWER PLANT

September 13, 2016

Honorable Governor Gina Raimondo  
RI Energy Facility Siting Board  
Janet Coit, Director, RIDEM  
Carol Grant, Director, Office of Energy Resources  
Meg Curran, Chairwoman, RI PUC  
Parag Agrawal, Associate Director, Division of Planning  
Michael Wood, Town Manager, Town of Burrillville

With great concern and contemplation, the Blackstone Valley Tourism Council Board of Directors has voted to stand against the proposed Invenergy Clear River Energy Center. The Tourism Council has worked as a steward for more than thirty (30) years for our nine Blackstone Valley communities. The Tourism Council operates not only as a tourism development agency but also as a manager of the Sustainable Tourism Development Laboratory, which recently developed a Geo-Tourism plan for the Town of Burrillville.

The Blackstone River Valley is considered the birthplace of America's Industrial Revolution and Economic Freedom. Excessive industrialization has also earned us the title of the first unsustainable landscape in North America. Since 1787, industrial waste deposited in our rivers and streams has severely crippled and polluted our landscape, rivers and air.

The Tourism Council utilizes our 240 square mile landscape for the purposes of investigating ways to balance our environment, our economy and our cultural resources. Our agency has become globally recognized as a pacesetter in sustainable tourism development. Our newly announced Blackstone River Valley National Historical Park is a testament to this work.

Professionals from the United Nations World Tourism Council, the George Washington University, the World Travel and Tourism Council, the University of Surrey in England, The US Environmental Protection Agency and the US National Park Service have assisted in the Blackstone Valley regeneration. The process of reclaiming our landscape has not been a simple one, with billions of dollars being spent in restoring our lands and rivers to a natural state.

The Clear River Energy Center proposal is a bold contradiction to the values and beliefs held important to the Tourism Council and its work and sets the Blackstone Valley back in time. Therefore, the Blackstone Valley Tourism Council Board of Directors requests opposition of the proposed Invenergy Clear River Energy Center.

Blackstone Valley Tourism Council, 175 Main St., Pawtucket, RI 02860-401-724-2200  
Robert D. Billington, Ed.D., President – [bvri@aol.com](mailto:bvri@aol.com)