Burrillville Conservation Commission

105 Harrisville Main Street
Harrisville, Rhode Island 02830

January 28, 2016

Burrillville Town Council
105 Harrisville Main Street
Harrisville, RI 02830

RE: Proposed Invenergy & Spectra Energy Power Facility
Clear River Energy Center
Town of Burrillville, RI
Cover Letter

Honorable Town Council Members,

The Burrillville Conservation Commission is a seven member, non-for profit, municipally funded organization, formed under R.I.G.L. with a mission focused on all aspects of local conservation of resources within the community of Burrillville.

The Commission focuses on educational campaigns aimed at teaching our local youth about local resources, to public participation in community environmental events, maintaining select public land areas dedicated to conservation purposes and serving as a technical liaison to the various functions of the local government.

The Commission provides technical input to the local offices and municipal boards on land development projects with the goal of ensuring the health, welfare and safety of the residents we are appointed to serve are maintained.

Please accept the attached letter on behalf of the Burrillville Conservation Commission as it relates to the subject matter. Should you have any questions or need additional information from the Commission, please do not hesitate to contact the undersigned at your convenience.

Respectfully submitted on behalf of the
Burrillville Conservation Commission

Kevin Cleary, PE, Chairman

Burrillville Conservation Commission

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RE: Proposed Invenergy & Spectra Energy Power Facility
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Honorable Town Council Members,

The Burrillville Conservation Commission respectfully submits a position of opposition to the proposed power facility currently sited for installation along the liquid natural gas transmission line, northeast region corridor, located in the northwesterly quadrant of Burrillville.

For obvious reasons a Conservation Commission cannot support any exploit of natural resources within the township to support an ever growing society based on fossil fuel consumption. The plight of the current generation should be resolved on finding ways to exploit renewable energy as opposed to a short sighted goal of introducing a modern power facility based on fossil fuel power production.

There is no need to explain the obvious health, environmental, safety and economic issues around further consumption of carbon based raw materials. There are plenty of shows on television, publications in engineering journals and listings on the Environmental Protection Agency's website on the continued reliance of fossil fuels to feed mankind's need for power.

Burrillville leaders should insist on reliance of renewable sources readily available to us. The State of Rhode Island should insist on modifying its power portfolio to more renewable sources for our State's needs. The Northeast Region of the country should look at better ways to strive for clean emissions in our atmosphere that ultimately end up over one of our largest food supplies; the Atlantic Ocean. The proposal before our community does not include this aspect in mind.

With any proposal comes compromise our local leaders must consider. Are we making the correct decisions for our children and our grandchildren? Are we making sound environmental sacrifices that are to the benefit of the community? Are we simply siding with big power because they are telling us we should? All these questions are real and we should expect real answers that we and the next generation can live with.

Thirty years ago Burrillville favored with a similar power facility to come on line in Town because, it was similarly well sighted between power and natural gas transmission lines. What have we learned from that experience over time? Ocean State Power facility has provided many worthy grants to our community's children. Ocean State Power facility has provided a steady stream of income to the tax base in the form of a payment in lieu of taxes. Ocean State Power facility once employed over 100 full time employees. There were certainly benefits the Town's leaders were willing to live with at the time, so concessions were made to ensure the Town received the best benefit it could.

What else have we learned over the last 30 years from OSP living in Burrillville? Light pollution has extended out for miles beyond the facility's borders. Noise pollution during peak power production could be heard upwards of 2 miles from its property boundaries. Land values immediate to the area were impacted negatively and some of our local highways and byways took 20 years to rebuild. Not all has been bad with the hosting of OSP, but the picture is far from perfect.

So what compromises should we consider with Invenergy and Spectra Energy teaming up to build a nearly double the size power facility in another corner of our Town?

Are we willing to permanently displace wildlife & wetlands?

Are we willing to increase noise & light pollution?

Are we willing to increase the risk of an LNG disaster or health concerns?

Is the exploitation of our local environment worth concessions our local leaders will consider for the next 30 years?

Will another power facility come knocking on the door in 30 years because Burrillville is still so advantageously positioned along the natural gas and power transmission corridors? Will we accept another power facility at that time because they tell us we should?

The Engineers, Scientists and Economic Experts working on behalf of Invenergy and Spectra Energy will certainly tell us yes to all the questions above, but what have we really learned over the last 25 years of having OSP hosted in our Town that we need to consider going forward during the deliberations of hosting another power facility.

The short term goal of this facility is almost certainly to offset the gradual shut down of other regional power stations that burn coal, oil or are perhaps driven by nuclear power. The long term goal however, may be to add another power station also driven on fossil fuels in Burrillville 30 years from now and we will be in no better position than now to say NO.

Burrillville should be resolved on insisting this generation and generations to come need to be relying on renewable energy from the sun, wind or water.

As the Invenergy Sighting Proposal is looked into further there are certain land areas that will be forever changed that are currently unfragmented large sections of forest. There are wetlands that will be permanently altered. There are machines and industry that will forever be present going forward. Wildlife will be displaced to support our ever growing need for power. There are obvious issues that for the surface value in the sighting proposal appear minor, which once looked at closer, are quite substantial.

Issues around the power sighting facility proposal range from 2 million gallons of back up fuel to diesel fuel storage areas for backup generators and fire pumps. These facilities are proposed in the report without membranes below for containment. These substantial volumes of backup fuels stored on site are shown in double containment cells, but the filling, conveyance and pumping areas where they are located are not lined below to protect Burrillville's most valuable resource: our groundwater. Understandably, the containment cells are not likely to fail and spill, but where the most potential for spillage to occur are the points of filling, conveyance and pumping where valves can fail, pumps can break and most notably human error can occur.

Supply water to the facility is proposed from offline former Pascoag Utility District wells contaminated with MTBE. The existing PUD wells have been contaminated for the last 15 years, so it is understandable why PUD would be interested in entertaining this project. The proposals in the project include setting up an activated carbon filtration system at the location of the wells to clean the groundwater prior to conveyance up to the power station's 1-million gallon storage tank. Can any emissions or pollution from the contamination build up in the activated carbon pollute the local air surrounding the PUD wells? Where does the spent activated carbon laden with MTBE go once it is used? The pollution concentration must go somewhere. Are we being good stewards by potentially moving our pollution into someone else's backyard?

Looking further at the water demand proposed by the facility, 0.225 Million Gallons of water is required under normal summer peak load. The proposal further indicates when running on oil, the daily water demand will nearly quadruple to about 1-Million Gallons.

Two questions that come to mind are where does the 1-million gallons of water per day come from and when did burning oil at this facility come into the equation?

Where does the oil supply come from and under what circumstances does oil come into the operation?

When did oil produced power come into the equation with this power facility? OSP had to pipe oil and water lines for miles along Route 146A, Route 102 and Douglas Pike to their facility.

What are the output production of the defunct PUD wells rated at? Can these wells meet this type of long term water supply demand without significant constraints on the groundwater resources adjacent to the wells? If the PUD wells do not meet the demand for the power facility, where will the water come from? OSP has locked up much of the water in the Blackstone River during periods of drought, which do occur intermittently through the years. Trucking could be seen all summer in 2015 with dozens upon dozens of 8,000 gallon truck loads of water being delivered to the OSP Holding Pond on Route 102. All the truck emissions in the peak of summer during the peak power demand; do we want those trucks traveling through our main streets and neighborhoods in Harrisville and Pascoag? What will happen along Route 100? Will it become a truck shipping route for water during drought times? This solution to water shortage only adds to the many problems this proposal contains. This proposal does not tell us where additional water supply will come from? When drought is present, the regional power facilities get water anywhere they can, even if the withdrawal sites are not legal.

The wastewater from this facility is proposed to be discharged into the Burrillville wastewater treatment facility. Has our sewer service area been fully built up with service lines in the intended areas originally identified in the facilities plans? Should we be taking care of the areas intended to be serviced not yet online, as opposed to allocating valuable treatment facility capacity to an outside industry not in the sewer district service area?

The proposed facility is sighted directly on top of groundwater classified at GAA groundwater. This classification of groundwater is the most pure designation of groundwater environmental scientists classify groundwater resources with. Are we willing to risk our local designation of our GAA water to something potentially less? One major fuel spill, one major explosion, one major facility failure, one small human error has the potential to jeopardize our groundwater miles away.

The report does not indicate where the power facility will obtain potable water for human consumption from. The workers, offices and potable water facilities located on site are not explained as to their origin. Will a driven well be supplied to meet potable water demand on site or is another drinking water utility line proposed to be extended from Pascoag to the site along Route 100?

What will happen to our local roads during all the construction of utility lines and the facility? Then what will happen for the next 20 years while Burrillville and RIDOT are stuck with fixing those roads at the taxpayers expense? OSP's oil & water line installation from the Blackstone River, into Burrillville along Route 102 and up Route 7 were just fixed in 2013 and 2007, respectively. Prior to those time frames water and oil manhole covers could be seen protruding through the shoulders of the highways and rutting in the travel lanes directly resulted. The Town fixed portions of Route 7 in 2007 at the cost of nearly $500,000 and the State of Rhode Island finally corrected portions of

Route 102 just two years ago under a $2,400,000 project, finally ending the roadway impacts associated with OSP's utility installations. Burrillville recently fixed Grove Street and Laurel Hill Avenue 10 years ago with local tax dollars, putting a final fix to the disruption sewer extensions created back in the early 1980's. Are we ready to dig those roads back up again?

The new power facility proposes a power line lateral extending to the existing power transmission corridor north of the site. To complete the power line lateral, approximately 14.5 acres of new clearing and permanent vegetation removal will be required in forested lands. Additionally, what the proposal does not define in any detail, aside from the Electromagnetic & Magnetic Field Appendix toward the end of the report, the applicant does not disclose in any detail the extent of further land clearing that will be required along a 6-mile stretch of the existing National Grid corridor on the northerly/easterly side of the easement to connect this power station to the existing switchyard adjacent to Ocean State Power on Sherman Farm Road. This additional land clearing would likely result in approximately 140 acres of land permanently cleared where they provide no detail for what so ever in the report. Connecting this facility to the Grid will result in the construction of a 3rd set of additional high tension power lines and H-frame structures from Wallum Lake Road to Sherman Farm Road.

Over the last 4 years Burrillville has permanently lost just over 150 acres of forest land along the National Grid transmission corridor from North Smithfield to Thompson, CT due to the reliability project that occurred.

How much more are we willing to lose?

Upwards of 4 to 5 acres of permanent wetlands filling and alteration are proposed as a result of the project? Will these wetlands which not only serve as valuable wildlife habitats, but flood controls; be restored elsewhere or replicated? They should be; it is the least that can be given back. Additionally, USACOE requires large scale wetland fillings to include up to 1.5-times the amount of fill in the form of replication. No indication of wetlands replication or compensation is discussed in the siting report.

In addition to the 67 acres proposed to be permanently disturbed there will be an additional 83 acres that will be indirectly disturbed due to a "halo" effect around the project areas cleared, as detailed in the siting proposal.

The developer's report indicates they are aware that species of birds, some of which are currently listed as threatened, that will be permanently displaced as a result of the proposed forest fragmentation. The same birds were identified in this area as their breeding grounds. Are the benefits of this project worth the need to push these bird species to a vulnerable, endangered or to the brink of their extinction? Do we want the Black Throated Blue Warbler to become endangered when we have the ability to prevent it?

The project needs further evaluation.

Were Alternate sites considered over Burrillville, if so where? Certainly the planning for this project started better than a decade ago; the planning is much too far along?

The leaders of Burrillville have a unique crossroad in front of them where they must decide the fate of the town for the next generation. Are our leaders willing to fall victim of further carbon polluting byproducts or do we look to exploitation of cleaner renewable energy technologies instead? The engineers and scientists for Invenergy and Spectra Energy will tell us Burrillville is best sighted for this power facility with the least amount of risk, but are we?

Should this letter on behalf of the Burrillville Conservation Commission be submitted as an opposition to the proposed power facility it is asked the developer propose a renewable energy plan alternative for comparison. Should the leaders of our community decide the best interest of our town's future generations is an LNG power station today, then certainly the Town should demand the parties responsible for this project give something more back to the community.

The leaders of this State and the Town are certain to proceed through a negotiation process of what payment the State will receive by hosting such a facility. The Town will also, likely be waiting with an opportunity to receive a mutual, financial benefit from hosting.

But what can we really ask from this facility that will leave a lasting legacy for our successors to know we tried to give back more than we took away?

The administrators and finance managers of the town will likely see opportunities to stabilize the Town's tax base and find a short term mechanisms for maintaining minimal tax increases. The Town's schools, planners, engineers and emergency services will find uses of the payment based revenue for capital improvements, expanded school services, infrastructure needs and other critical town services.

But what will we give back to the Town for what we allowed to forever be taken away?

What will we give back to the local environment?

For all the acreage this project in tandem with the National Grid Reliability Project have taken away in this community we should receive a pledge that no less than 5 times that amount permanently disturbed will be given back in land stock held in conservation for perpetuity....forever.

If the Town's leaders favorably nod approval for the proposed power station, the

Conservation Commission respectfully requests that no less than 2,000 acres of non-contiguous land be acquired by the developers anywhere within the Town of Burrillville over the course of the next 25 years and that all said acreage be held in perpetuity in the form of conservation easements, at a reduced taxable rate by the local tax assessor; an average of 80 acres per year. Said land under any such agreement shall not be subject to sale, transfer, subdivision, development or any outside purpose other than refuge for local wildlife and conservation purposes.

Surely, the 30-year projected lifespan of this facility's carbon output is far greater than 2,000 acres of conservation land's carbon absorption ability, when compared regionally?

The Commission respectfully requests consideration of funding of local educational programs aimed at the locally conserved lands acquired under such an agreement during the 25 year period focusing on local conservation techniques, maintaining sustainable resources and implementation assistance of renewable energy alternatives made available to our local residents. The overall goal of said educational program is driven by the need to become less dependent on fossil fuel energy sources.

The Conservation Commission respectfully requests the Town Council to declare a proclamation supporting expansion of renewable energy while transitioning away from reliance on fossil fuel consumption.

Should you have any questions or otherwise like to meet to discuss the merits of the proposed LNG facility with any members of the Commission, please contact me at your convenience.

Respectfully submitted on behalf of the
Burrillville Conservation Commission

Kevin Cleary, PE, Chairman

Cc: Michael Wood, Burrillville Town Manager
U.S. Sen. Sheldon Whitehouse
Janet Coit, Director, RIDEM
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