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Richard Enser <rickenser@gmail.com>

Re: Slide show presentation at EFSB Public hearing/Roselli

To: Paul Roselli; Bianco, Todd (PUC)

[copied recipients redacted]

To: Todd Bianco, Coordinator, Rhode Island Energy Facility Siting Board

I have been following your email conversation with Paul Roselli regarding the public hearing scheduled for March 31st and wanted to request some additional clarification as I am also planning to make a visual (slides) presentation that will take longer than 5 minutes.

Let me first observe that I agree with Paul in regards to not having Invenergy make a presentation unless they want to report on any significant changes that have been made in their application since it was submitted. Whether or not members of the public were able to attend the preliminary hearings in February, the application is on the EFSB web site and anyone attending the public hearing will have had plenty of time to review it. However, those attending the hearing to provide comment on the proposal will not have had the opportunity to review information that has not yet been submitted to the EFSB, and thus the hearing serves a second purpose as an information-gathering enterprise, both for the benefit of the Board and the public. Information-gathering becomes a very critical area when considering issues that have not been addressed in the application, and where no outside sources have been identified to provide a thorough review.

I will be providing information on Biodiversity, an issue that has long been considered a critical area to review in regards to land use decision-making. The Council on Environmental Quality recommended in 1993 that Biodiversity considerations be incorporated into the Environmental Impact Analysis process under the National Environmental Policy Act (NEPA), as the decline of local and global biodiversity was recognized as being driven almost exclusively by anthropogenic actions. My expertise in biodiversity issues is from 28 years with the Rhode Island Natural Heritage Program (NHP), an office within RIDEM responsible for inventorying the biodiversity of Rhode Island and providing expert opinions for planning and environmental review purposes. In this regard, the NHP would have been the agency assigned to review the potential impacts to biodiversity of the construction of any power plant in Rhode Island, our comments would have been included within a coordinated DEM response.

The NHP was dissolved in 2007 and there is currently no state agency or personnel available to provide a biodiversity review, so as the former coordinator of the NHP, I will be providing that review in several regards. First, the Board and the public should understand that information provided by Invenergy in the application is woefully inadequate in assessing impacts to biodiversity - there have been no inventories performed, databases reviewed, identification of conservation lands in the immediate vicinity, or analysis of impacts at the landscape scale. Despite this lack of information we can offer a partial review of potential impacts based on studies conducted in similar situations in other areas, and also provide a review of information that will be needed in order to understand all the impacts specifically associated with the Clear River project.

I respectfully request, therefore, to be allowed the time necessary (which I would expect to be about 20-30 minutes) to present my information at the hearing; however, I do not request this time as a special case. Everyone planning to present should be allowed as much time as they need, even if that means conducting this hearing over several sessions in order to insure that everyone has had their opportunity. I think we can all remember public hearings on similarly significant issues that have transpired in this manner.

Richard W. Enser, Coordinator  
Rhode Island Natural Heritage Program, retired.