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TOP ROAD

5 minute version

My name is James Libby of Harrisville. I have been a registered architect in Rhode Island for twenty years. I am accredited by Leadership in Energy and Environmental Design, am certified by the National Council of Architectural Registration Boards and am a member of the American Institute of Architects. I also served on the Burrillville Planning Board for nine years, ultimately as Vice Chairman. Many of my projects have received award recognition for their innovative solutions to environmental issues.

This power plant does not comply with significant policies of State Planning Reports and Burrillville's Comprehensive Plan. A few of these policies include: *describe the following:*

1. Increase use of renewable energy to **lower** energy costs.
2. **Reduce** dependence on natural gas to **stabilize** electric rates.
3. Economic development should harmonize with adjacent uses.
4. **Reduce** air pollution levels in our town and state
5. Maintain and improve the quality of drinking water in the community.
6. Minimize the environmental impacts of power generation & transmission facilities.
7. Minimize forest fragmentation.
8. Concentrate infrastructure within villages & limit expansion to outlying areas.

I am familiar with hundreds of pages detailing state & town planning policies and am unaware of **ANY** policies recommending increased use of fossil fuel power plants.

The Rhode Island State Energy Plan indicates **98 percent** of the state's electricity is generated from natural gas piped from other regions. With virtually all electricity already generated from natural gas; **now** is the time to invest in renewable energy to meet current and future energy needs.

After closing coal fired power plants, CO2 levels in New England were reduced between 2010 and 2014. However, ISO New England reported that New England CO2 emissions actually increased in 2015 with the rising combustion of natural gas. The Boston Globe recently reported, "We are over-dependent on natural gas for power in New England" and "Natural Gas is no longer a part of the solution in the fight against carbon emissions in New England, but part of the problem."

Regarding economic growth, Burrillville has a balanced approach that concentrates construction activity in our village centers, business parks and industrial parks; not in sensitive natural areas as proposed by this power plant. I have personally been involved with:

1. A new commerce park
2. A new retail nursery
3. New CVS Pharmacy
4. New Medical & Dental offices
5. Converting a Grammar School & Stillwater Mill into apartments

This town is very supportive of economic development when its based on sound design principles, and we have demonstrated our ability to develop economic stability; without this power plant.

Regarding Land Use, Rhode Island Reports state, "*The distinction between Rhode Island's historic neighborhoods and their rural natural surroundings remains the most important feature of the State's Land Use pattern*". Nowhere is this distinction more clearly defined than Burrillville. Village centers are complimented by multiple wildlife areas, rivers and reservoirs. Construction of a massive power plant covering more than 65 acres is inconsistent with sound development goals; blurs the distinction between our villages, rural areas, and waterways; and degrades our quality of life.

This project pipes **partially** treated MBTE contaminants across our aquifer, and also pipes contaminated water from the plant cooling process, to the town's sewage treatment plant. These contaminated waters will run through town designated aquifers placing this community's drinking water at risk. This project also trucks millions of gallons in oil, delivers thousands of gallons of ammonia, increases storm water runoff, infills wetlands and diminishes re-charge areas; further degrading our water resources.

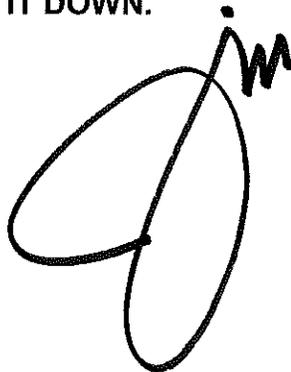
Constructing a power plant, expanding compressor stations, widening power lines and upgrading gas piping; also fragments hundreds of acres of forestland; accelerates deforestation, destroys natural habitats and contradicts policies on forest management.

In Conclusion; approval of a second power plant in this town is an **Environmental Injustice** as defined by the EPA. No other town in this state has TWO power plants of this magnitude within their borders. This plant, when combined with the existing Trans Canada power plant, means Burrillville will be generating approximately the same electrical output as all other major power plants in Rhode Island; **combined**. Thus, subjecting this community to a disproportionately high burden on the health and the well-being of our citizens.

Support for this power plant shows blatant disregard for documented policies of our state planners, architects and engineers; dismisses detailed studies by our environmentalists, biologists and scientists; while ignoring years of input, decision making and community involvement by our citizens.

In consideration of this projects lack of compliance with significant policies outlined in Comprehensive Planning at both the town and state level; **I respectfully request that Invenergy withdraw their application for a SECOND power plant in Burrillville; AND if it is NOT withdrawn, that the RI State Siting Board OPPOSE its construction and VOTE IT DOWN.**

Thank you, James Libby

A large, stylized handwritten signature in black ink, appearing to be 'J. Libby'.

Gov. Romulo
Legacy Power Plant?

INTRODUCTION

My name is James Harrison Libby; I reside at 1264 Round Top Road in Harrisville, RI. I have been a registered, licensed architect in the state of Rhode Island for twenty years. I am an accredited Leadership in Energy and Environmental Design professional, am certified by the National Council of Architectural Registration Boards and am a member of the American Institute of Architects.

My Rhode Island projects have won numerous awards from including the Phoenix Award for Brownfields Redevelopment. I am the Project Manager for a \$140 million dollar project currently under construction in the center of Downtown Hartford Connecticut.

I also served on the Burrillville Planning Board for nine years, ultimately in the role of Vice Chairman. I am familiar State Planning policies and with this Towns Comprehensive Plan having reviewed it, updated it, and having implemented it for nine years. This evening I would like to offer comments on this project as they pertain to this Towns approach to development.

ECONOMIC DEVELOPMENT

This power plant does not comply with significant policies of our Comprehensive Plan regarding economic development, including

VII.2.a Promote economic development which is sited and designed to fit within the rural character of Burrillville and harmonizes with environmental surroundings and adjacent uses.

Enhance Economic Development in “*The Route 102 Development Management District and Village Planned Development Overlay Zone*”

Burrillville has a balanced approach to development that is providing successful economic growth in our community. New construction related economic activity is being generated right where we need it: in our village centers, in our business parks and within our industrial parks; not in the center of our unique natural features as proposed by this power plant. Projects I have personally been involved with include a:

1. 250 acre commerce park on route 102
2. A new retail nursery on route 102
3. New CVS Pharmacy in Pascoag
4. Expansion of Well One Medical & Dental in Pascoag
5. Conversion of the Pascoag Grammar School to apartments
6. Stillwater Mill Conversion to apartments in Harrisville;
7. new town library in Harrisville
8. and Stillwater Heights senior housing in Harrisville

The town is very supportive of economic development when its based on sound design principles. Our economic development policies align with the policies of the Rhode Island; Report #121, the Economic Development Element. The plan emphasizes that Rhode Island stabilize energy costs to improve economic success saying to, “*Promote: energy efficiency, the siting and regulation of wind turbines, removing regulatory barriers for solar power, and (promote) climate change resiliency.*” Burrillville has demonstrated its ability to develop its own economic stability; without this power plant and we mandate renewable energy be sought to improve economic competitiveness regarding energy costs, not fossil fuels.

AIR

This power plant does not comply with significant policies of our Comprehensive Plan regarding air quality, including

1. VI.2.a *“Encourage measures which **reduce** air pollution levels”.*
2. VI.2 *ensure air quality in Burrillville meets ambient air quality standards and maintain air quality levels in town higher than these standards.*

After years of closing coal power plants, CO2 levels in New England were reduced between 2010 and 2014. However, last week, ISO New England reported that Regional CO2 emissions actually increased in 2015 with the rising combustion of natural gas. Caitlin Peal Sloan, an attorney with the Conservation Law Foundation was quoted in last week’s Boston Globe as saying, “We are over-dependent on natural gas for power in New England”. “Natural Gas is no longer a part of the solution in the fight against carbon emissions in New England, but part of the problem.”

This project will result in significant increases in Trucking emissions associated with filling and maintaining this project’s (2) 1,000,000 gallon oil tanks. Trucking will also be required to fill 40,000 gallon ammonia tanks. Tail pipe emissions from the trucking industry will further pollute the air in our community. Lastly, when natural gas supplies are unstable, this plant will be burning oil as its fuel source, increasing the volume of emissions and diminishing the purported benefits of natural gas.

NATURAL RESOURCES

This power plant does not comply with significant policies of our Comprehensive Plan regarding natural resources, including:

1. Policy II.5.a where, "*Wildlife and vegetation are considered important natural and economic resources to be preserved.*"
2. ***IX.5.b Minimize the adverse impacts of power generation and transmission facilities on the environment.***

Our towns policies align with the state's Forest Management Plan which says: "*Conserve and restore Rhode Island's forests so as to minimize forest fragmentation. ... promote the development, protection and maintenance of forested landscapes to protect water quality*". Constructing a power plant, expanding compressor stations, widening power lines, upgrading gas piping; all negatively fragment hundreds of acres of forestland; contributing to de-forestation of our state and town.

Construction of a second power plant in this town is equivalent to an **Environmental Injustice** like that defined by the Environmental Protection Agency. No other city or town in this state has TWO power plants of this magnitude within their borders. A new plant, when combined with the existing Trans Canada power plant in Burrillville, means Burrillville will be generating approximately the same electrical output as all other major power plants in Rhode Island; **combined**. And as a result, this community will be subject to a disproportionately high burden on our environment; jeopardizing existing natural management areas, destroying excessive natural habitat and defragmenting our forested areas.

Power Plant	Nameplate Capacity (MW)	Primary Fuel	Dual Fuel Capability
Entergy Rhode Island State Energy LP	596	Natural Gas	
Manchester Street	515	Natural Gas	Distillate Fuel Oil
Tiverton Power Plant	272.5	Natural Gas	
Ocean State Power	254.2	Natural Gas	Distillate Fuel Oil
Ocean State Power II	254.2	Natural Gas	Distillate Fuel Oil
Pawtucket Power Associates	68.8	Natural Gas	Distillate Fuel Oil
Rhode Island LFG Genco	33.4	Landfill Gas	
Toray Plastics	12.5	Natural Gas	
Central Power Plant	10.7	Distillate Fuel Oil, Natural Gas	
Rhode Island Hospital	10.4	Natural Gas	Residual Fuel Oil
Block Island	9.6	Distillate Fuel Oil	
Brown University Central Heating	3.2	Natural Gas	Residual Fuel Oil
Total	2,041		

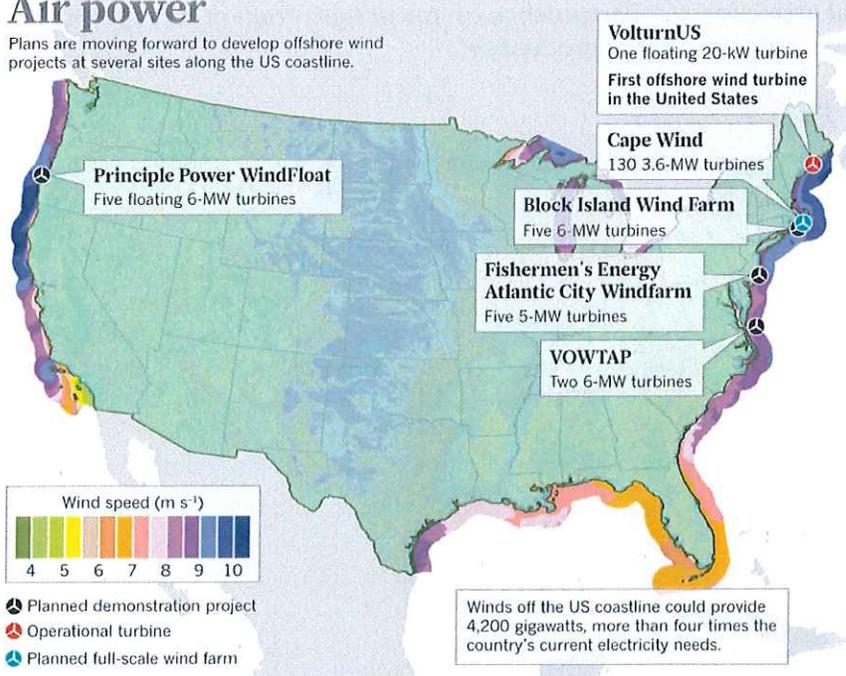
Source: EIA-860 Annual Electric Generator Report

Figure 4. Major power plants in Rhode Island, their fuel mix, and the capacity they deliver.

The combination of Ocean State Power, Ocean State Power II and the proposed power plant, will result in Burrillville generating approximately the same electrical output as all other major power plants in Rhode Island; combined, placing an undue burden on citizens health and natural environment.

Air power

Plans are moving forward to develop offshore wind projects at several sites along the US coastline.



According to the Rhode Island Division of Planning, RI State Energy Plan drafted June 2016, “The state’s most significant renewable energy resource from a power production standpoint is offshore wind”. Figure from Nature.com

For the Boards consideration: Additional economic impacts to the town's economy may include but are not limited to:

1. Funding to Fire Departments for specialized equipment related to major industrial accidents
2. Funding to Police & Emergency Response for preparedness for major industrial accidents & security threats
3. Funding for roadway and intersection modifications for large scale commercial trucking
4. Funding for Sewage Treatment Plant modifications needed to process industrial waste water piped from the power plant
5. Funding for Underground water pipe infrastructure to pipe from the MBTE well site to the power plant and from the power plant to the waste water treatment facility
6. Funding set aside for environmental cleanup when the plant is no longer viable and is decommissioned
7. Funding appropriated specifically to assist the inevitable and necessary transition to renewable energy
8. Funding to purchase open space as a mitigation measure for the environmental damage caused by construction of this facility
9. Additional real estate funding for impacts beyond the power plant site; specifically property value losses attributed to substantial land clearing to widen miles of transmission lines
10. Additional real estate funding for impacts associated with increased natural gas pipe capacity.
11. Additional compensation for hosting a facility providing power to Massachusetts
12. Additional compensation for hosting a facility providing power to Connecticut
13. Additional funding for health related issues caused by concentrated air pollutants
14. Additional funding for emergency response preparedness related to groundwater contamination within our community