

## Environment Council of Rhode Island

Statement Re: Invenergy Plan  
Fall 2015

Climate change is the most urgent problem facing Rhode Island and, indeed, the world. One of the major causes of climate change is the burning of fossil fuels, like coal, oil and natural gas, to make energy. In this context, the Environment Council of Rhode Island (ECRI) strongly opposes the proposal to build a new, long-lived natural gas fueled electricity generator in Burrillville. ECRI supports the quickest transition to clean, renewable energy and greater energy efficiency; this is not the time to be building new fossil fuel-fired power plants.

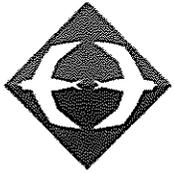
The Environment Council of Rhode Island is the voice of the environmental community in Rhode Island. It is a coalition of all 62 small, medium, and large environmental groups in the state.

Spring 2016

On January 22, 2016, as part of a broader interview in which he said he supports the Invenergy plant, Senator Whitehouse also said that his view on Invenergy is not opposed by “the larger environmental community,” from whom there has been “no blowback whatsoever.” Senator Whitehouse is mistaken on this last point. ECRI is the united voice of Rhode Island’s environmental community; it is the coalition of all 62 small, medium, and large environmental organizations in the state. ECRI was an early opponent of the Invenergy plant, and ECRI continues to be a strong and consistent opponent.

While ECRI has deep respect for Senator Whitehouse’s work in the U.S. Senate to address climate change, ECRI regrets that in his Jan. 22 interview Senator Whitehouse misrepresented the views of Rhode Island’s environmental community.

To be clear: ECRI strongly opposes the proposal to build a new, long-lived fossil-fuel plant in Rhode Island, because building this plant would make it impossible for the state to meet its short-, medium-, and long-term goals for carbon-emission reductions.



Connecting People with Nature

# Audubon Society of Rhode Island

## **The Audubon Society of Rhode Island Opposes Invenergy's Proposed Clear River Energy Power Plant March 8, 2017**

The Audubon Society of Rhode Island's mission is to protect birds, other wildlife and their habitat through conservation, education and advocacy for the benefit of people and all living things. Audubon opposes the proposed 900MW power plant in Burrillville, Rhode Island for the following reasons:

**The Invenergy Plant will disturb the integrity of western Rhode Island's forested habitats and wildlife corridors.** The proposed Invenergy power plant would undermine the integrity of one of the most intact, forested areas in not only in Rhode Island, but also in Southern New England. Large tracts of forest are critical to the region's biodiversity as well as our ability to adapt to and mitigate against the threats of climate change. The Department of Environmental Management's Advisory Opinion to the Energy Facility Siting Board states this clearly, "substantial forest clearing and fragmentation from the project will negatively impact area-sensitive wildlife (and plants) in the site vicinity, and that, at a broader spatial scale, this Project will inhibit DEM's attempts to enhance landscape resiliency to mitigate the loss of biodiversity through habitat fragmentation and climate change (p. 12)" and "Rhode Island has prioritized and invested in this area for wildlife conservation for decades. The location of a Facility of this size and scope immediately adjacent to substantial acreage of State holdings of conservation land is not consistent with the conservation priorities that informed these state conservation plans (p. 23)."

**The Invenergy Plant undermines Rhode Island's ability to achieve greenhouse gas reduction goals set in the 2014 Resilient Rhode Island Act.** The Resilient Rhode Island Act of 2014 set specific greenhouse gas reduction goals for the State of Rhode Island: 10% below 1990 levels by 2020; 45% below 1990 levels by 2035 and 80% below 1990 levels by 2050. Rhode Island's Executive Climate Change Coordinating Council (EC4) is charged with developing a plan for achieving the Resilient Rhode Island Act's greenhouse gas reduction goals. The plan, issued in December 2016, states, "An 80% GHG reduction by 2050 would likely require a near-zero carbon grid coupled with significant electrification of residential/commercial space heating and on-road vehicles". The Invenergy facility is not the right decision for the state or the region if we are urgently moving toward a near-zero energy grid. According to Timmons Roberts<sup>1</sup> the Ittleson Professorship of Environmental Studies and Sociology at Brown University, "Building a new 900-megawatt gas- and oil-fired power plant in Rhode Island will make it impossible for the state to achieve the carbon-emission-reduction goals set forth in the Resilient Rhode Island Act".

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<sup>1</sup> <http://www.clf.org/blog/timmons-roberts-new-fossil-fuel-power-plant-in-rhode-island>.

## **TNC Statement for the ECRI release**

The Nature Conservancy prides itself on the pursuit of non-confrontational, pragmatic solutions to conservation challenges. We rarely take a public position on a specific development project. Invenergy's proposed Clear River Energy Center would do such harm to Rhode Island's ecology, to our wildlife, and to our resilience to climate change that we are compelled to oppose this new power plant.

Our analysis of wildlife corridors of the Eastern United States shows that the plant is proposed to be built right on top of an essential pinch point for habitat connectivity.

This corridor of unfragmented forest is critical to the health of the ecosystem both on a daily basis and in response to disruptions. Connectivity helps maintain genetic diversity in a population of plants or animals. Additionally, wildlife may need to escape a natural disaster, avoid encroaching human development, or adapt to seasonal changes in the availability of food, water, and shelter. Animals require reliable pathways to find those resources.

Connectivity becomes even more important as our climate changes. As temperature and precipitation patterns shift, many species will need to seek new suitable habitat. When habitat connectivity is cut off, species that can't migrate or adapt will not survive.

Invenergy's proposal for a new power plant – and the pavement, light and noise pollution, wetland destruction and deforestation that comes with it – at this pivotal location would irreversibly disrupt one of the region's healthiest ecosystems along the borderlands with Connecticut.

The Energy Facility Siting Board may only grant a license when an applicant has shown that "the proposed facility will not cause unacceptable harm to the environment." This power plant would cut off the ability of plants and animals to adapt to a changing climate, and undermine important ecological functions across an area that stretches far beyond the physical footprint of the facility. That is an unacceptable harm to the environment, and the board must reject this application.

## **About The Nature Conservancy**

The Nature Conservancy is a global conservation organization dedicated to conserving the lands and waters on which all life depends. Guided by science, we create innovative, on-the-ground solutions to our world's toughest challenges so that nature and people can thrive together. We are tackling climate change, conserving lands, waters and oceans at unprecedented scale, and helping make cities more sustainable. Working in more than 65 countries, we use a collaborative approach that engages local communities, governments, the private sector, and other partners.

Statement on the Invenergy Power Plant Proposal

Climate change, caused by the burning of fossil fuels, is threatening Narragansett Bay and its adjacent coastal waters. Coastal wetlands are already degraded by rising sea levels, and damaging erosion is increasing along our shoreline. Warming water temperatures are raising the risk of eutrophication and adversely affecting our native fisheries and other marine and avian species. The impacts of climate change upon Rhode Island's environment are well documented and increasing in severity.

At Save The Bay, our mission and expertise are focused on the ecological health and resilience of Narragansett Bay, its watershed, and adjacent coastal waters. The proposed power plant will be located on the Clear River in the watershed of the Blackstone River, a major tributary to Narragansett Bay. We have serious concerns with respect to the power plant's impact on the Blackstone River watershed and Narragansett Bay itself. Specifically, we are concerned about impacts to freshwater wetlands, water quality, stream flow, water temperature, riparian habitats, forest integrity and habitat quality. Save The Bay will carefully review any and all permit applications with a keen eye on potential impacts to Narragansett Bay and its watershed if and when applications are complete and available for public review.

ECRI Press Conference 3/8 re opposition to Invenergy plant

ANA-RI paragraph

Climate change will impact human health in a variety of ways as the relationship between living organisms to one another and to their surroundings change. Environmental changes such as increased heat waves, sea-level rise, and increased drought around the globe will aggravate already-existing health problems, increase the onset of new health problems, and, in some cases, cause premature death. (1) Climate change is Rhode Island's and the world's most urgent problem. One of the major causes of climate change is burning fossil fuels.(2) ANA-RI is opposed to the proposal to build a new, natural gas fueled electricity generator in Burrillville and supports continued work to transition to clean, renewable energy and the efforts to change/promote/energy efficiency.

1. Climate change and human health: the role of nurses in confronting the issue.  
<https://www.ncbi.nlm.nih.gov/pubmed/20838179>
2. The Sources and Solutions: Fossil Fuels  
<https://www.epa.gov/nutrientpollution/sources-and-solutions-fossil-fuels>
2. How Humans Have Disrupted The Nitrogen Cycle  
<https://www.sciencedaily.com/releases/2009/06/090604144322.htm>



## Burrillville Conservation Commission

105 Harrisville Main Street  
Harrisville, RI 02839



FEBRUARY 20, 2017

INVENERGY - CLEAR RIVER ENERGY CENTER: ECRI PRESS RELEASE

After careful review of the application submitted to the Energy Facility Siting Board by Invenergy, LLC in October, 2015 and all supplemental information provided thereafter, for the construction of a 950 mega-watt power station, the Town of Burrillville Conservation Commission has taken a formal position opposing the proposed siting. The State of Rhode Island's investment in conservation and resource protection in the immediate surrounding 7,500 acre area over the last 40 years is a testament to why this region of the State commands the maintained protection it is has been given. The proposed siting is an ill fated use of available resources, counters 40 years worth of source area protection our tax dollars have paid for and represents a complete detriment to not only the health, safety and welfare of the people of Burrillville, but the greater tri-State area as a whole. The Burrillville Conservation Commission cannot identify any positive aspects from the construction of this facility at this site, other than money and exploitation of our community's unique rural landscape. The long term detriment to the environment, the local resources and the community is simply not worth the amount of money the application has presented that it will generate. For these reasons the State of Rhode Island Energy Facility Siting Board needs to find the easily justifiable and defensible argument to deny the application.

Signed

Kevin Cleary, PE, Chairman  
Burrillville Conservation Commission

## RHODE ISLAND CHAPTER



**Citizens' Climate Lobby**  
**Citizens' Climate Education**



The Rhode Island Chapter of Citizens Climate Lobby supports emission reductions of carbon pollution, and does not support new fossil fuel infrastructure in the Ocean State. Since the state is obliged to prepare for a one-foot sea level rise by 2030 caused by the extraction and burning of fossil fuels, tax dollars and investment strategies should be focused on zero carbon energy sources and on climate-resilient infrastructure by 2030. Investment now in more natural gas is incompatible with the legally binding emission-reduction goals of the state. Instead of looking backwards with increased reliance on health-endangering fossil fuels, we should look forward toward diversifying our energy portfolio with the adoption of widespread energy conservation measures, and the increased use of electric vehicles and sustainable biofuels, along with wind, solar, geothermal, and tidal energy. The social cost of carbon pollution (which includes methane and other greenhouse gases) now approaches \$40 per metric ton - this should be included in cost-benefit analyses when decision-makers are evaluating projects.

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## Clean Water Action Statement

"If Rhode Island truly desires to transition to a renewable energy economy and slow the effects of climate change, it must stop allowing the construction of new fossil fuel infrastructure. In the wake of the Resilient Rhode Island Act of 2014, which calls for a 10% reduction of 1990 emission levels by 2020, we must continue to move forward towards this clean energy future. The Burrillville power plant is most decidedly not a move forward but instead, a step backwards. We cannot afford the additional carbon emissions that the plant will generate, nor the estimated 102,000 gallons of water the power plant will use every day. And we certainly cannot afford to once again put the drinking water supply of Burrillville residents at risk. Clean Water Action opposes the construction of this facility and urges the Energy Facilities Siting Board to deny Invenergy's request to build it - for the sake of all of Rhode Island's residents and natural resources."

## **Conservation Law Foundation**

Conservation Law Foundation (CLF) strongly opposes the permitting or construction of Invenenergy's proposed 1,000-megawatt fracked gas power plant. Climate change is the most urgent environmental issue facing Rhode Island, the nation, and the world. We must not squander hundreds of millions of dollars in fossil-fuel infrastructure that, if built, will make it impossible for Rhode Island to meet its short-, medium-, and long-term carbon-emission-reduction goals. That is why CLF is proud to be litigating in the Energy Facility Siting Board to prevent the permitting of this fracked gas plant.

## Fossil Free Rhode Island

Rhode Island has a choice to make: we can travel further down the fracked gas bridge to nowhere, or blaze a trail to a clean energy-powered economy for other states to follow. We cannot do both. Building the proposed power plant would lock us into even greater dependence on fossil fuels for decades to come, accelerating global warming and undermining the goals of the Resilient Rhode Island Act of 2014. In addition, it would violate Article 1, Section 17 of the Rhode Island Constitution, the duty to protect air, land, and water. The plant would consume water from the Scituate Reservoir, which provides sixty percent of the drinking water for Rhode Island residents and businesses. As climate change progresses, droughts will become more severe and prolonged, and sometime in the not-so-distant future, we may find ourselves unable to meet our own needs while supplying water to the power plant. Furthermore, the power plant would pose a serious threat to the health, safety, and well-being of the residents of Burrillville, who overwhelmingly oppose the project, and is not even needed to meet electricity demand in Rhode Island. In fact, most of the power it produces would be consumed out-of-state. To date, twenty-nine of Rhode Island's thirty-nine municipalities have passed resolutions opposing the power plant. It's time for Rhode Island's decision-makers to listen to their constituents and reject this power plant once and for all. We must then begin a rapid phase-out of fossil fuels, with an equally rapid ramping-up of renewables and conservation. This will provide a just transition for Rhode Island workers and jump-start the green-energy revolution, raising our state's profile as a leader in renewable energy solutions and preserving a livable climate for our children and future generations.

## **Mercy Ecology**

Mercy Ecology strongly opposes the permit to build a dual powered fracked gas/diesel power plant in Burrillville, RI, because of environmental, public health and climate change alarms currently being sounded by concerned citizens and Rhode Island environmental advocacy groups. Mercy Ecology stands with the people of Rhode Island who want to keep fossil fuel in the ground and who want to mobilize a movement to create jobs in renewable energy. The protection of the climate is the most serious issue we face. We will not avoid disaster by destroying our forests, rivers and tugging on all the strands holding the natural world intact.

Mary Pendergast, RSM

Director of Ecology

Sisters of Mercy Northeast

Providential Gardener ([www.ProvGardener.com](http://www.ProvGardener.com)) visualizes Rhode Island as a garden, and we, all the citizens of Rhode Island, are the current stewards of this beautiful place. This is not just a nice idea -- our lives and the lives of future generations depend upon this land's clean air and water. Rhode Island is the second most densely populated state, and it is under increasing pressure to build on more and more of its undeveloped land. We need to be conservative about protecting every acre that is currently undeveloped. Once land is developed, the damage cannot be undone. Providential Gardener joins Rhode Islanders throughout the state in opposing the Invenergy Plant in Burrillville that would trap us in outdated fossil-fuel electricity generation technology for another 40 years, compromise one of the largest conserved forest habitats in southern New England, and put unnecessary obstacles in the way to meeting our greenhouse gas reduction goals. Invenergy argues it is needed for peak load times, but it has only sold half its capacity in the last two ISO forward capacity auctions. Energy efficiency measures, including time-varying rates for electric supply, recommended by the Acadia Center,(1) are much cheaper than building this plant, which may never be used at full capacity and indeed may be completely redundant a few years after completion, leaving us with a looming useless hulk instead of a pristine forest. Given the state's commitments made in the Resilient Rhode Island Act, it is counterproductive to be considering approval of the Invenergy Plant. Providential Gardener is also concerned about the many places in the DEM Advisory Opinion on Invenergy's proposal where DEM stated there was inadequate information for them to give a conclusive opinion. Too many details are unclarified. The Energy Efficiency Siting Board should insist on complete plans and not trust Invenergy to comply after giving their approval. There are many ways to make electricity, and Rhode Island officials should focus on encouraging businesses that can expedite our march toward energy independence. The General Assembly should be looking ahead, passing laws that foster renewable energy development; enable increased distributed generation and net metering; and establish a tax on carbon.

(1) [http://acadiacenter.org/wp-content/uploads/2015/06/Principles-for-Consumer-Friendly-Rate-Design\\_June-2015.pdf](http://acadiacenter.org/wp-content/uploads/2015/06/Principles-for-Consumer-Friendly-Rate-Design_June-2015.pdf) p. 3.

<http://www.ProvGardener.com>

Rhode Island Interfaith Power & Light strongly opposes the proposed fracked gas power plant in Burrillville on moral grounds. Faith communities believe that we have a moral responsibility to Care for Creation. This means maintaining a healthy environment and passing on a healthy planet to our children and succeeding generations. Our Earth system is critically and rapidly overheating due to the release of carbon dioxide and other greenhouse gasses created by humanity's activities, especially the burning of fossil fuels such as natural gas. If we do not urgently and drastically reduce our emissions, Rhode Islanders will especially suffer: geologic history shows that the last time greenhouse gas levels were this high, sea levels rose to 20 ft or more higher than now ([https://climate.nasa.gov/climate\\_resources/7/](https://climate.nasa.gov/climate_resources/7/) ). RI has the Resilient RI Act in place that helps us serve as a model for the nation in reducing greenhouse gasses. If the Burrillville power plant is constructed, its greenhouse-gas emissions alone will prevent Rhode Island from reaching its mandated and morally important goal. A decision not to build this power plant is the morally right action.

Blessings,  
Kristen Ivy Moses  
Executive Director  
Rhode Island Interfaith Power & Light  
*A faith-based response to climate change.*  
[www.ri-ipl.org](http://www.ri-ipl.org)  
(401)324-9142

## Rhode Island Student Climate Coalition

The Rhode Island Student Climate Coalition is a statewide alliance of students and youth working for a clean, safe, and just future for all. We envision a sustainable economy that supports clean air, land, and water. We are working diligently to promote social and environmental justice by transitioning away from dirty energy.

As students and young people, we are especially concerned about keeping Rhode Island livable for our generation and those to come. Accordingly, we oppose the construction of new fossil fuel infrastructure, including the proposed plant in Burrillville. Building this plant would lock us into decades of dangerous carbon emissions and make it impossible for us to meet the targets established by the Resilient RI Act.

Rhode Island has the opportunity to become a national leader in the clean energy revolution. To delay is to betray our obligations to our environment and our people.

Toxics Action Center opposes the proposed Invenenergy plant that would bring huge amounts of dangerous air pollution to Burrillville, destruction to a beautiful, rural swath of Rhode Island wilderness, and millions of tons of global warming pollutants to our climate. If Governor Raimondo and Rhode Island's leadership are serious about protecting the health of its residents and addressing the threat of climate change, they cannot support this massive – and unnecessary – source of pollution. Join the thousands of Rhode Islanders from Burrillville and across the state, every environmental group, and the 30 towns and cities that (as of noon on February 14<sup>th</sup>) have taken a stand against Invenenergy.