

March 3, 2015

Mr. Robert Stein, Chairman
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Subject: Docket No. 192B-Oxford CPV Towantic, LLC Motion to Reopen and Modify the June 23, 1999 Certificate of Environmental Compatibility and Public Need based on changed conditions pursuant to Connecticut General Statutes §4-181a(b) for the construction, maintenance and operation of a 785 MW dual-fuel combined cycle electric generating facility located north of the Prokop Road and Towantic Hill Road intersection in the Town of Oxford, Connecticut.

Dear Chairman Stein:

Please accept the following as a Pre-Filed Statement in combination with the Naugatuck River Revival Group's Exhibit 1 and its accompanying transcript (hand delivered to the Siting Council). We hope this will further the Siting Council's understanding of the Naugatuck River, the Naugatuck River Valley as a whole and how it relates to this project.

For the record the Naugatuck River Revival Group (NRRG) is in complete agreement with the Naugatuck Valley Audubon Society's (NVAS) pre-filed papers. There is no need to repeat all the information.

CPV representatives are asserting that they will do no harm to the local environment beyond its property line. They are also arguing that the Siting Council must agree to allow the building of this Facility based on the fact that Connecticut is part of ISO New England and that the overall benefit to New England will be a net reduction in pollutants.

It is our position that the risk of negative environmental and economic externalities over time is too great at the local level. It was stated by CPV representatives that the externality that they considered within their proposal was the fact that when this plant is in operation and other coal and oil plants are taken off line New England, in general, will be better off because this plant pollutes less. In other words, there will be an improvement in overall air quality on a regional basis by the reduction of emitted pollutants. Is this saying the Naugatuck River Valley and New Haven County must take one for the team? Pollution will increase because of this plant.

We believe both the Naugatuck River Valley and the Naugatuck State Forest's (NSF) fragile ecosystem pays and has paid enough without additional pollutants that this Facility will generate over the next 30-40+ years.

We believe that CPV and some members of the Siting Council may be looking for the state and environmental groups to prove that Towantic's air and water discharges do harm to the Pomperaug Basin, the Naugatuck Basin, including, but not limited to, the NSF's ecosystem's before denying CPV's permit. It is our position that CPV must prove it is not harming the surrounding ecosystems. Their isopleth maps would have us believe that their discharges fall a short distance from the Facility. They claim this pollution will harm nothing, with the rest disappearing quietly into the wind.

How can we accept their position that Connecticut is not an island and at the same time accept their testimony that their emissions will fall within their property? We find this statement confusing. Does this mean Towantic's emissions will be immune to air currents? Does CPV have that much control of the weather and air currents?

The wildlife studies are far from conclusive and out of date. There seems to be little concern for or no knowledge of any Connecticut Threatened or Endangered species nesting within 10 miles of this plant. Environmental assessments are no more than a sentence or paragraph. 15 years old documents are being considered with no consideration of the monumental environmental gains made since 1999 within the Naugatuck River Valley. We believe the petitioner has not been responsive to these concerns.

CPV representatives have clearly stated that nothing has changed since the 525MW Facility was introduced in 1999 making a case they should not start from the beginning of the permitting process. However, they also are enthusiastic in pointing out how things have changed with efficient new technology since 1999. Making the case for a significantly larger 805 MW plant. The NRRG exhibit 1 will show how much has changed since 1999 within the Naugatuck River and the Valley. Millions of dollars have been spent and will be spent on restoring the damage to the Naugatuck River and Valley and reducing the pollution it has been plagued with. Millions more are being spent on Greenways in both the Valley and Middlebury to improve the quality of life for all Connecticut residents and future generations. This Facility will impede this progress.

We recognize it is not within the CSC charge to consider the Naugatuck River's past damaged and environmental nightmare talked about in George Black's book *The Trout Pool Paradox*. We do feel it is important for the Siting Council to consider and understand that the Naugatuck River and the Valley has come a long way since 1999. However, it is still improving. It has a long way to go in correcting its current impairments. As the NVA stated in their pre-filed testimony the Valley still has its

share of impaired Ground Level Ozone and nonattainment issues. To allow for a footprint this large would not only go against Connecticut's 20/20 clean energy policy but it will add additional stress to this environment.

Senator Blumenthal states in Exhibit 1 that the Valley as a whole is greater than each town separately. Oxford is a part of that unique system but is willing to provide a venue for pollution over the coming decades in exchange for money.

CPV would have us believe the sky over New England will fall if Towantic is not built. Maybe it is time for Greater Boston to look closer at who should pay the price for its growth.

We are grateful for the opportunity the Siting Council has provided and hope that we were able to contribute by showing the changes and improvements in this fabulous ecosystem.

Respectfully,

Kevin R. Zak
President
Naugatuck River Revival Group