

January 23, 2015

State of Connecticut
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Attn: Melanie A. Bachman, Acting Executive Director

Re: Docket 192B-Towantic Energy, 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 Megawatt 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 Attorney Bachman,

In accordance with the filing guidelines provided by the Council, I, Kate Truini, am submitting this letter on behalf of Westover School in Middlebury where I direct Environmental Sustainability programs. I am herewith submitting additional pre-filed testimony, to make a Statement of Position on the above captioned document.

Westover School, founded in 1909, is an independent college preparatory school for girls, grades 9-12, boarding and day. We have a rigorous academic curriculum, and also have a robust sports department and we compete with other schools in the area. We are located at the intersection of South Street and Whittemore Road in Middlebury, approximately 2.75 miles from the proposed site of the CPV plant, Towantic Hill. Our campus consists of academic and residential buildings, athletic fields, meadows and woodlands on 133 acres. The school is located on the picturesque green in Middlebury and is known for its rural character. Sugar maples and apple trees abound. The school was designed by one of our country's first women architects of some note, Theodate Pope Riddle. Sensitive to rural New England landscapes from the start, when Theodate designed the school in 1909, three apple trees in the orchard were saved and the main building, a quadrangle, was built around them.

Our concerns about the power plant are fourfold and all relate to the changed conditions and new information in accordance with CGS § 4 - 181 a(b). They pertain to the increase in the size of the proposed power plant (now 785 MW as compared with a 500 MW plant proposed in 1999) and the resultant increase in air pollutants and sound and affect this increase will have on our school campus and community.

First, we have ongoing concerns about our 70 acres of wetlands and woodlands. We have 20 years of tree growth data in our hickory and oak deciduous forest gathered by our students over the years. We would like to be assured that our soils and trees, which are

already being stressed by a variety of environmental and biological factors, will not be stressed further by the increase in air pollutants, including PM_{2.5}, nitrous oxide, and ozone, emitted from the burning natural gas in the 785 MW combined dual cycle power plant. We are currently dealing with multiple tree deaths every year as a result of the Hemlock Woolly Adelgid, and ongoing White Ash and Sugar Maple decline. Although ozone emission is known to have deleterious effects on White Ash and other tree species in Connecticut (Douglas. "Recognizing Tree Diseases and Stress Factors", link: http://www.ct.gov/caes/lib/caes/documents/publications/fact_sheets/plant_pathology_and_ecology/recognizing_tree_diseases_and_stress_factors.pdf), given more time to research we could see what studies have been done on the short and long term effect of the variety of air pollutants emitted during the burning of natural gas on the soils and native trees in our Northeast Temperate biome. We are particularly interested in any possible effect of emissions on the soils of the immediate area, since we are downhill from the surrounding land on South Street, and are concerned that any soil pollution could potentially affect our watershed and directly interfere with the Westover Pond.

Secondly, we have concerns for the health of our student athletes and for all of the children in a 10 mile radius that play field sports. Recent data suggests that the PM₂ produced by gas power plants is particularly harmful to the health of respiratory systems in children and will aggravate asthmatic conditions. These particles are too small to be filtered by our body's protective mechanisms in our trachea or bronchial tubes, and can enter into the small alveoli of the lungs (link: <http://www.epa.gov/pm/health.html>). If Westover is any example, we have about 20 students with respiratory problems who are engaged in active field sports. This is roughly 10% of our student body. The increase in PM_{2.5} may further aggravate their asthmatic conditions. No power plant is worth putting the future health of children in jeopardy. Roughly 70% of our student body participates in field sports each fall and spring. These students are engaged in actively running for 2 -3 hours a day, playing field hockey, soccer, cross-country, and hiking, paddling, and climbing through our Outdoor Program.

On a related note, the 2014 Harvard Study correlating pregnant mothers in their third trimester exposed to PM_{2.5} and increased risk of their child being born with an autism spectrum disorder is of grave concern (link: <http://ehp.niehs.nih.gov/wp-content/uploads/advpub/2014/12/ehp.1408133.acco.pdf>). As a school for women, this particularly concerns us, as 70% of our faculty and staff is female. Over the last few years, we have had a bountiful increase in children born to our young faculty, and their is no end in sight. Westover offers an incredible opportunity to successfully blend a career and family life, and many people choose to work at Westover because they are able to bring their spouse and children, and serve as dorm parents or live in campus housing.

Third, five years ago the science department at Westover School purchased a 10 inch Celestron telescope for our observatory tower. From the tower on very clear, usually cold nights, the science faculty offer observations of the moon, planets or stars for students and, at times, the community. Unfortunately, we suffer substantial light pollution in the eastern sky arising from the city of Waterbury. The power plant will further inhibit our

viewing as the hot emissions from the 150 foot stacks will distort images seen through the telescope when looking at objects in the southern sky. In addition, the huge amount of water vapor from the stacks, a major by-product from the combustion of natural gas (methane) will obscure visual study and research, particularly in cooler weather when normally, without such emitted water vapor, the atmosphere is clear and free of such industrial visual degradation.

Lastly, we are concerned about the role the power plant will play in changing the rural character of this area. Because the technology for the proposed plant is so new and the plant is so large, we do not know if the sound or vibrations emitted from the air intake and cooling fans will be heard or felt on our campus. We do not know how the clean air we now breathe will be changed. Even if the impact of the plant is slight, the perceived impact of a huge combined cycle gas/oil electrical generating plant 2 miles away could negatively influence our enrollment and our unique place in the history of the area. Many people choose Westover School for their daughters because it is in a quiet setting on a village green with clean air and surrounded by rural landscapes. Students move to Westover from urban areas, including New York City, Tokyo, Shanghai, Beijing, Moscow, and Mexico City, some of which have the highest levels of air pollution worldwide. We occupy a unique niche in our town's history and the history of the surrounding area, and we cannot afford to lose our rural setting or have the perceived rural character of our campus challenged.

For the reasons given above, we stand in opposition to the proposed power plant and would be glad to present further evidence on the above points if the Council permits a 90-day extension for comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Kate J. Truini', with a stylized flourish at the end.

Kate J. Truini
Director of Environmental Sustainability Programs
Westover School

CERTIFICATION

I, Kate J. Truini, hereby certify that a copy of this filing has been sent on January 23, 2015 to all parties and intervenors listed on the Connecticut Siting Council's Service List and has been filed with the Connecticut Siting Council.

A handwritten signature in black ink, appearing to read 'K. Truini', is written above a horizontal line.

Kate J. Truini