WESTOVER HILLS HOMEOWNERS - Final Submission
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April 27, 2015

Via Electronic Mail and US First Class Mail

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

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

Dear Chairman Stein and the Siting Council Board,

It is with great concern that we ask the Connecticut Siting Council to carefully review the application before it for a combined cycle dual fuel 785MW power plant proposal on Prokup Road in Oxford, Connecticut.

Per the applicants' own submissions, intervenor and expert testimony and further information gathered from the record and from the applicants numerous and voluminous late filings and in the hearing testimony lasting almost five months; the applicant has failed to establish that changed conditions have occurred or that the public benefit provided by a baseload power plant of this size outweighs the potential environmental impact to the quad communities of Oxford, Naugatuck, Middlebury and Southbury which surround the plant site. The residents of these communities all of which reside at significantly lower land elevations from the proposed facility, to the State of Connecticut as a net exporting state or to the New England Electrical Grid distribution system.

Per the applicants' own submission, **the CPV Towantic Power Plant will rise at one of the highest points in a 2 mile radius around the proposed facility**. The site plan calls for two large diameter smokestacks and various other buildings to rise to 992 feet above the tree lines and at the top of a significant and prominent ridgeline which serves as a natural and regionally noted scenic boundary for the communities of Naugatuck, Oxford, Middlebury and Southbury.

The pollution plumes which are anticipated to be expelled by the smokestacks, by the applicants' own testimony, **will rise another 300-500 feet above the 992 foot physical structures above the trees and ridgeline**.

These residential communities sit at various elevations significantly lower than the proposed CPV plant. The residential community of Westover Hills in Naugatuck, sits between 300-410 feet in elevation some 500-900 feet lower in elevation and between 2 and 3 miles northeast of the proposed CPV plant site.

This elevated siting creates a unique pollution hazard to the several hundred residents at the Westover Hills Subdivision and to the thousands of other residents in adjoining lowlands who will be subject to increased and adverse exposure to proposed pollutants which through natural dispersion and force of gravity will fall to the lowest points, residents in lowlands, Westover Hills Subdivision being one of them.

The applicants' air modeling and testimony nuanced over effects of very low wind and stagnant conditions or ultra high humidity days in which natural wind based dispersion dilutes and distributes pollutants over a wider field, lessening localized impacts. **By the applicants' own admission, the pollutants would contain themselves largely to "within the fence line" of the 26 acre CPV Power Plant parcel on typical days.** This was a refrain that was repeated by the applicant at various junctures throughout the hearing testimony and one that defies the inherent uncertainty of weather and seasonal changes in conditions.

While modeled extensively largely in hypothetical's, the applicants "fenceline"assertion (if taken as factual) must include those same facts to reach the conclusion that the 588 tons of pollutants per year they propose to release is planned to disperse only within the 26 acre densely developed parcel sitting at 840 feet above sea level and at one of the highest points in the quad community area. **This area**, by the applicants own admission, **would be subject to weather patterns, natural site erosion and typical weather conditions which inevitably will cause water and runoff from higher elevations to permeate and contaminate lower elevations and lowland areas**, Westover Hills Subdivision being one of them.

The applicant when pressed for detail on soil contamination and effects on the surrounding lowland communities, including Westover Hills, provided Dean Gustafson as an expert witness. His response to our questioning was that his scope was limited to the 26 acre development site and not to surrounding lowlands downhill from the site.

His response was equally distressing when questioned on his lack of knowledge of the existence of the Long Meadow Brook Aquifer and its importance to the hundreds of western Naugatuck residential wells and of particular importance to the Westover Hills Subdivision which relies on this as a water source.

The Westover Hills Subdivision potable water is supplied by a series of artesian wells which are fed by the Long Meadow Brook Aquifer. This aquifer originates in Oxford, just downhill of the CPV Power Plant site and works its way through Naugatuck toward the Naugatuck River. This aquifer is a vitally important part of the water resource plan for the subdivision and for the potable water needs for each household in the subdivision as city water is not available to the subdivision. This matter was never studied, reviewed or accounted for by the applicant or Dean Gustafson, its expert in the modeling and/or hearing testimony and its impact beyond the property line was admittedly never contemplated, especially to the lowland properties that surround the site, Westover Hills being one of them.

The power plant as proposed and through hearing testimony flies in the face of inter community harmony and disclosure. It proposes a negative inter-municipal impact from a neighboring host community which proposes to denigrate the air and water quality in most of western Naugatuck and at great disproportion to the homeowners in the Westover Hills Subdivision, many of whom resided in the subdivision prior to the filing of both application dockets 192 and 192b. **This application is in direct contradiction to the prior and updated Naugatuck Valley Regional Council of Governments Plan of Conservation and Development for Oxford, Naugatuck, Middlebury and Southbury**. Westover Hills Subdivision and all other developments post 1992 have had to adhere to the strict zoning guidelines and the guidelines of the Regional Plans of Conservation and Development which strangely make no mention or contemplation of a proposal for the heaviest of heavy industry, a base load power plant in one of the most natural, rural, unspoiled residentially populated settings and coincidentally also one of the highest elevation locations of the quad community area.

The applicants' submission seems to somehow conclude that a 785MW base load power plant sited at one of the highest elevations for such a plant in the State of Connecticut; no other plant towering so tall; and so closely over the surrounding residential communities and no other plant scheduling to emit 588 tons of various pollutants per year to surrounding and nearby lowland residential communities as touted as a public benefit.

That reasoning simply does not add up. **The local vicinity surrounding the plant will suffer dramatically in order to attempt to theorize that a potential reduction in regional emissions could occur should the retirement of older less efficient plants take place**. (this is an unsupported supposition that ***the applicant has no control over*** and recent reports have shown the opposite to be trending as older plants retrofit gas turbines ***in addition to*** coal and oil generation, thereby increasing regional emissions).

Elementary knowledge of the laws of gravity tells us that what goes up, eventually must come down. The question is not whether the pollutants will come down, but rather in what form and to what degree. The applicants tell us that their air modeling theory expects these pollutants to disperse over a "wide area" but the more accurate answer lies under what conditions? Is it a 7mph wind which ensures that the homeowners in subdivisions below 922feet in elevation do not get choked in effluent? Or, is it a 0mph

wind which gathers the effluent cumulatively and billows it as gravity dictates, choking the lower lands before filling the higher elevation to the brim of the ridgelines with pollutants acceptable as a significant public benefit outweighing the risk? That question was not answered before, during or after the testimony. It remains unclear to us today.

When there is no wind and the lowlands are saturated, do the toxins, as the applicant suggest, contain themselves to the fence line of the 26 acre site? If so, where do the fence line contained toxins go when there is a 25/50 or 100 year storm? Logic and gravity tell us that water flows downhill. In the case of The Westover Hills Subdivision and all other similarly situated residential properties sitting below 922feet in elevation the toxins are in the air if the wind blows or rather on the ground and in the aquifer if the air is stagnant.

The applicant points to a change from a GE F Series Turbine to a newer GE H Series turbine as 5.6% more efficient than the previous turbines in docket 192. When questioned by us regarding the increase in pollutants the applicants' response was that the new proposal was more efficient. The applicants' Potential to Emit submissions however show a marked increase in four out of six pollutants and the total emissions of green house gases at **686,930 more tons per year** than the previous smaller configuration 512MW proposal under docket 192. While slightly more efficient, ***the substantial increase in output of the newer proposal outweighs any environmental gain and actually pollutes substantially more due to the much larger size of the plant.***

We ask the Siting Council to consider that the applicants' claim of public benefit by adding 785mw to a grid which ISO New England has deemed to have adequate supply to meet demand through 2024 and weighing that against the outright exploitation of the natural environment by permitting a 785MW proposal versus a more modest smaller configuration solution perhaps a smaller single turbine plant or one that incorporates some form of renewable resource especially in light of the proximity to so many residential units, so close to the proposed facility and all in lower elevations expecting to be substantially detrimentally affected. It is our contention that this does not provide a public benefit outweighing detrimental environmental effects.

There are many questions regarding the actual need for new generation, whether it is compelling or even necessary. There are many questions whether Connecticut as a net exporting state should host a fossil fuel plant at all, let alone one of such size and environmentally damaging magnitude and at the highest elevation in the middle of a largely residential lowland bedroom community setting. There is no question regarding the demand points of the Boston and Rhode Island markets as being most consumptive and most in need of new generation. It would be most efficient even from the grid load standpoint to site generating facilities closer to the demand points, preferably in remote locations, sited at lower, less environmentally sensitive elevations.

A smaller plant, perhaps a one turbine installation, 400mw plant with some renewable component could potentially offer greatly diminished environmental hazards, while still meeting a regional goal of helping to promote a fossil fuel free future.

It is for these reasons that we ask for a rejection of the application.

Should the Siting Council be moving to approve the application, we ask that as a condition of approval, the Siting Council mandate the installation of ambient air quality sensors in the The Westover Hills Subdivision to be installed within 90days of approval to monitor the air quality and sensors in the Long Meadow Brook to monitor water quality prior to the construction and operation of the facility to ensure that the local air and water quality is not denigrated substantially to affect the quality of life for our residents and those who rely on the water resources of the Long Meadow Aquifer for communities.

Thank you for the opportunity to voice our concerns to your board.

Respectfully submitted,

Chester Cornacchia
Westover Hills Homeowners
Naugatuck, CT

I certify that a copy of the attached document was sent on April 27, 2015, via U.S. First Class mail or electronic mail, to each participant on the attached service list for this proceeding.

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Chester Cornacchia
Westover Hills Homeowners
Naugatuck, CT