

To: Melanie Bachman, Exec. Dir.

From: Jay Halpern, Party, Docket 192

Re: Challenge to Proposed CPV Towantic Power Plant

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SITING COUNCIL**

Please note this document doesn't only represent an objection to the proposed changes – CPV Towantic has signaled they will build the original permitted proposal if changes are not approved – but to the construction of this power plant altogether.

1. The recently outlined changes simply validate our opposition to many environmental, technological and construction deficiencies we have maintained since 1998.
2. The reduction in emissions is minimal, while the energy output has been increased by approximately 30%, handily increasing CO2 production, the primary greenhouse gas, by 45%.
3. Redistribution and shortening of stacks simply brings pollution closer to the residents of three towns without ameliorating any interference with airport traffic.
4. From the very beginning, the choice of site was purely to take advantage of a fortuitous proximity of gas and power lines, without any consideration of what are normally deemed essential local parameters for construction. This has led the CSC to engage in a sorry display of critical thinking gymnastics to approve that site (originally zoned residential, by the way) as appropriate to such heavy industry. Inland power generation tapping into aquifers and sources of potable water have never been assets to any communities in any way, shape or form.
5. Nothing in the new proposal gives any comfort that our drinking water will remain secure, particularly during warm spells when maximum energy will be drawn from it.
6. No mention was made of emergency resources to be made available in the event of a significant accident or other disaster consuming the power plant. The local, mostly volunteer, emergency services in three towns, including Oxford, have already clearly indicated such a situation would be treated as a HAZMAT event, meaning nobody in his or her right mind will go near the plant until it burns out.
7. No mention was made of the enhanced transportation access that would have to be developed to get the turbines onto Woodruff Hill or to enable the steady stream of fuel oil shipments (euphemistically called *sterilized* diesel) required to keep that oil fresh and ready for utilization. No new traffic flow studies were presented in this regard.
8. One of the pitfalls of the Town Meeting form of governance when a malleable and self-aggrandizing government rules, is that when announcements of a meeting to pass corrupt statutes, such as “you don't have to pay taxes,” “you don't have to meet deadlines or sell back property when deadlines aren't met,” “you can pollute all you want,” “your project is a worthy

one” without formal authorization etc, and the executive board sees an audience full of opposing voices, it simply goes into “executive session,” disappearing for hours until the angry citizens are gone because they have to work in the morning. Then they re-emerge from watching Transformers in the board room, do their dirty work, and go home. While this political morass doesn’t come under the purview of the CSC, it certainly speaks to the virtue of placing a power plant where there’s no vigilant Fourth Estate, and no vigilant fiscal monitoring, as glaringly noted with the recent arrest and conviction of Oxford’s former tax collector. Thus, it has become part of the CSC mandate to ensure that all terms of certification and approvals, including those of the selected site, should be vigilantly scrutinized to make sure certification parameters aren’t later undermined after the CSC has “done its job.” When Citizens for the Defense of Oxford challenged, before Superior Court, certain rights of the CSC regarding approvals, we lost because it was maintained that those rights and responsibilities were inherent in the CSC’s mandate. By extension, therefore, the CSC’s mandate to protect the environment, the health and welfare of localities, and the integrity of approved projects also means that all matters of taxation, resource allocation, restitution for damages, mandatory bonding, etc, must be clearly outlined in any proposal and reviewed in a timely manner by the CSC, in order to hold certified project developers to their commitments and to enable localities to protect themselves from foreseeable and foreseen disasters. No such bonding or other protections are included in the proposal or have yet been demanded by the CSC.

In conclusion, the proposal as drafted is inadequate for approval, and I look forward to a series of public hearings before a new population in Oxford to determine whether the formerly residential site on Woodruff Hill should become home to one of the heaviest of industries.

Jay Halpern

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