



# Naugatuck Valley Audubon Society

P.O. Box 371  
Derby, CT 06418

January 10, 2015

As an Audubon chapter our purpose is to preserve and protect our natural surroundings, and to educate the public about our environment and its benefits. The proposed power plant is in one of the towns we serve, and will impact other towns we are active in, as well as Naugatuck State Forest. Naugatuck Valley Audubon Society has an interest in Naugatuck State Forest due to its designation as an Audubon Important Bird Area in 2004.

Naugatuck State Forest is a popular birding location visited by many Connecticut residents especially during breeding season and migrations. As noted in the Important Bird Area Conservation Plan recommendations the forest management practices incorporate providing habitat for declining bird species. There are 83 bird species that may be found within the forest which are noted as important birds in the CT Comprehensive Wildlife Conservation Plan and 10 species of birds listed as a "Species of Special Concern" in Connecticut's Endangered, Threatened and Special Concern Species 2010 report.

The Environmental Overview prepared for CPV Towantic by Tetra Tech states that DEEP noted a possibility of three species of bats, Red, Hoary, and Silverhaired, all of which may be on the property, as well as Eastern Box Turtles. All are listed as "Species of Special Concern" in Connecticut's Endangered, Threatened and Special Concern Species report. As defined in the report: "Species of Special Concern" means any native plant species or any native non harvested wildlife species documented by scientific research and inventory to have a naturally restricted range or habitat in the state, to be at a low population level, to be in such high demand by man that its unregulated taking would be detrimental to the conservation of its population or has been extirpated from the state.'

This Environmental Overview only covers the acreage of the power plant. There is a statement that "for the vast majority of environmental and community issues, no significant changed condition has occurred" (p37). This ignores the advances in science and understanding that has taken place since the initial permit was issued. There is repeated mention of new technology being used in the plant, and meeting all current emission standards that are stricter than originally called for. We would like to see current science and knowledge applied as well to evaluating the impact that this power plant will have on the surrounding area if it is allowed to proceed. A large portion of Naugatuck State Forest is within four miles of the plant, with much of that area highlighted on the Connecticut Natural Diversity Data Base Map (attached). Any environmental assessments and reviews performed with the original power plant application of 1999 are fifteen years or more out of date. Naugatuck Valley Audubon Society feels that with climate and habitat changes since 1999 a new in-depth Environmental Impact Assessment is necessary.





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We have concerns for the assorted smokestack emissions<sup>1</sup>, which will travel on the wind, as well as for the amount of water vapor produced by the cooling process. The smokestacks with permanent night lighting<sup>2</sup> will have an effect on resident and migrating birds. Noise from construction and operation of the facility will impact birds and other wildlife.<sup>3</sup> The amount of water required by the plant will have an impact on local water supplies which may cause conflicts with other users and the existing aquifers, ground water levels, and surface water. The waste water from the plant systems that will be sent ultimately to the Naugatuck River raises questions about capacity and ability of the Naugatuck treatment facility to handle this new load. We have referenced only a few of the research papers addressing the impact of an industrial site on birds and wildlife.

The state of Connecticut has a goal of twenty percent of its energy consumption from renewable sources by the year 2020, now only five years away. A new generating plant that does not replace any existing plants will be a detriment to the state's goal. Especially in light of the increasing pace of climate change, an additional power plant does not make sense. Renewable sources and conservation will be of greater benefit.

As residents in the nearby town of Beacon Falls we are also concerned on a personal level for ourselves and also the members of our Audubon chapter who reside in the towns of Oxford, Naugatuck, Beacon Falls, as well as other surrounding town residents. While the emissions are stated as having a much lower impact than a coal or oil plant, there is presently no powerplant so the construction and operation of this plant will put additional pollutants in the atmosphere.

We ask that the Connecticut Siting Council give full recognition to the passage of time since the original application, and deny amendments and extensions to the original permit.

Sincerely,

Handwritten signature of Jeff Ruhloff in black ink.

Jeff Ruhloff  
Naugatuck Valley Audubon Society  
Board of Directors

Handwritten signature of Sophie Zyla in black ink.

Sophie Zyla



<sup>1</sup> Durfort, M (01/01/1993). "Effects of air pollution on passerine birds and small mammals". Archives of environmental contamination and toxicology (0090-4341), 24 (1), 59.

<sup>1</sup> Sanpera, C (04/01/1995). "Metal accumulation in three species of passerine birds (*Emberiza* *cia*, *Parus major*, and *Turdus merula*) subjected to air pollution from a coal-fired power plant". Archives of environmental contamination and toxicology (0090-4341), 28 (3), 298.

<sup>1</sup> Laczewska, B (12/03/1995). "Effects of environmental pollution on breeding populations of birds in southern Poland". Water, air, and soil pollution (0049-6979), 85 (2), 829.

<sup>1</sup> Eeva, Tapio (09/19/2006). "Environmental pollution affects genetic diversity in wild bird populations.". Mutation research. Genetic toxicology and environmental mutagenesis (1383-5718), 608 (1), 8.

<sup>1,3</sup> Saha, Dulal C (11/15/2011). "Effect of air and noise pollution on species diversity and population density of forest birds at Lalpahari, West Bengal, India.". Science of the Total Environment, 409 (24), 5328.

<sup>2</sup> Miller, Mark W (02/01/2006). "APPARENT EFFECTS OF LIGHT POLLUTION ON SINGING BEHAVIOR OF AMERICAN ROBINS.". The Condor (Los Angeles, Calif.) (0010-5422), 108 (1), 130.

<sup>2</sup> Dark Side of Light. By: Yuhas, Daisy, Audubon, 00977136, May/Jun2013, Vol. 115, Issue 3

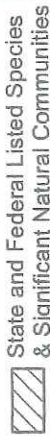
<sup>3</sup> Cardoso, Gonçalo C (10/01/2011). "On the relation between loudness and the increased song frequency of urban birds.". Animal behaviour (0003-3472), 82 (4), 831.

# Natural Diversity Data Base

## Areas

OXFORD, CT

December 2014



**State and Federal Listed Species & Significant Natural Communities**

**Town Boundary**

NOTE: This map shows general locations of State and Federal Listed Species and Significant Natural Communities. Information on listed species is collected and compiled by the Natural Diversity Data Base (NDDDB) from a number of data sources. Exact locations of species have been buffered to produce the general locations. Exact locations of species and communities occur somewhere in the shaded areas, not necessarily in the center. A new mapping format is being employed that more accurately models important riparian and aquatic areas and eliminates the need for the upstream/downstream searches required in previous versions.

This map is intended for use as a preliminary screening tool for conducting a Natural Diversity Data Base Review Request. To use the map, locate the project boundaries and any additional affected areas. If the project is within a shaded area there may be a potential conflict with a listed species. For more information, complete a Request for Natural Diversity Data Base State Listed Species Review form (DEP-APP-007), and submit it to the NDDDB along with the required maps and information. More detailed instructions are provided with the request form on our website.

[www.ct.gov/deep/hndbrequest](http://www.ct.gov/deep/hndbrequest)

Use the CTECO Interactive Map Viewers at [www.cteco.uconn.edu](http://www.cteco.uconn.edu) to more precisely search for and locate a site and to view aerial imagery with NDDDB Areas.

QUESTIONS: Department of Energy and Environmental Protection (DEEP)  
79 Elm St., Hartford CT 06106  
Phone (860) 424-3011



Connecticut Department of  
Energy & Environmental Protection  
Bureau of Natural Resources  
Wildlife Division

