



June 16, 2016

Mr. Jeffrey Partington
Chairman
Burrillville Planning Board
144 Harrisville Main Street
Harrisville, RI 02830

Re: Clear River Energy Center Master Plan Drawing Package Review

Dear Mr. Wood:

At your request, CDR Maguire and Sovereign Consulting Inc. (Sovereign) has provided a review of the documents submitted to the Planning Board on May 9, 2016. The submittal included a set of plans titled "Master Plan Drawing Package for Invenergy Clear River Energy Center" Dated March, 2016.

SUMMARY

On May 9, 2016 Invenergy submitted a Master Plan Submission to the Burrillville Planning Board. The submission included a set of plans that have been reviewed by CDR Maguire and Sovereign. The submittal did not include a stormwater report or traffic report and the plans did not provide detail that would normally be anticipated for a review. The Town Planner sent a letter to Invenergy's attorney on May 11, 2016 requesting additional information. A Traffic Study was received on May 27, 2016. The following are our review comments on the plans submitted, we will update our review as more information becomes available.

SUMMARY OF RECOMMENDATIONS

CDR Maguire and Sovereign recommend the following:

Request that Invenergy perform a stormwater analysis and provide a Stormwater Report and plans for the stormwater system proposed.

Request that Invenergy consider using Algoquin Lane in lieu of construction of the proposed access road. If this is not practical Invenergy should provide reasoning why this is not practicable, including information on the use of the existing Algoquin Lane and why this would not be suitable.

Request that Invenergy consider reducing the size of the laydown area or having off-site construction parking and staging to offset the massive amounts of wetland impacts.

STORMWATER

The plans indicate three stormwater detention ponds, no other drainage elements are indicated on the plans. These plans are not sufficient to address the projects stormwater needs, plans are needed that clearly indicate what is being done to collect, detain, and treat stormwater on the site.

Development of the site will result in increased stormwater run-off from the site, the developer will be required to treat and detain the run-off to avoid impacts to the areas receiving the run-off. The RIDEM Stormwater Design and Installation Standards Manual provides guidance for evaluating impacts of development and designing drainage elements to address these impacts. The developer should prepare a stormwater report to evaluate the impacts and design a drainage system that will address the impacts of the development.

WETLANDS

Sovereign has reviewed the plans to evaluate wetland impacts from construction of the proposed CREC, wetland impacts on the site need to be avoided and mitigated to the fullest extent practical.

Background. The current plans incorporate the construction of a new road which will pass directly through wetlands within the vicinity of the Proposed CREC Site. In addition to the proposed road the construction, the CREC plant is proposing lay down area and construction staging/parking within 50-foot perimeter wetlands.

The existing Algonquin gas facility has an access road that runs along the northern edge of the proposed CREC property (Algonquin Lane). Algonquin currently provides easement grants to SPRINT to service its cell tower located on the backside of their facility. Algonquin Lane may be suitable for use as the CREC site access road.

The current plan set and submittal states that the roadway needs to be able to handle large capacity truck loads. Algonquin Lane was established to construct the Algonquin facility and was clearly able to handle large trucks bringing in heavy equipment. Minor reconfiguration of the proposed CREC facility layout would allow for a more direct route into the CREC site without many sharp turns and without the need to construct a new road.

In addition to the new access road to the facility, the plans also include the construction of an access road to the new transmission lines as well as the temporary construction parking and laydown area, which would be further impacting wetlands. The parking and laydown area would clear cut the wetlands and make the area unsuitable for re-establishing current wetland conditions. Compaction of soils and removal of mature trees which makeup these forested wetlands take more than 40 to 50 years to re-grow. These functions and values cannot be restored once lost.

Avoidance of Wetland Impacts. The utilization of the Algonquin Lane would avoid the direct impact of 1.4 acres of wetland. This would also keep a larger contiguous wetland area and not segment the wetlands with culverts and permanent impervious surfaces. The reduction of paved surfaces also reduces runoff and contamination which would be released to the surrounding wetlands. These impacts are not always considered when looking at the full impacts to the area. The wetlands would further be impacted as the roadway would need to stay clear of vegetation and be maintained – thus creating a wider travel corridor than stated in the plans. Though the area might be vegetated it will be regularly disturbed throughout the growing season through mowing and vegetative maintenance practices. The removal of large broad leaved vegetation increases surface temperatures of the water within the wetland and reduces the quality of habitat for wetland wildlife. Additional sedimentation and

disturbance from traffic will further reduce the quality and function of the wetlands where the road crossing is proposed.

Moving the roadway to connect near the proposed CREC parking area and having the main entrance to CREC be on the northeast side of the proposed facility would reduce wetland impacts.

CREC has not addressed any of these concerns within their most recent submission to the planning board.

Recommendations

- Request that Algonquin Lane be shared and a redesign of facility entrance be created.
- If denied have detailed reasoning why this is not practicable, including information on the use of the existing Algonquin Lane and why this would not be suitable.
- Consider then reducing the size of the laydown area or having off-site construction parking and staging to offset the massive amounts of wetland impacts. If reducing the size of the construction laydown areas and parking can be reduced by at least 2.25 acres this may be able to be used as a mitigation effort of wetland avoidance and would offset the impact of the roadway, if it would have to be used.
- Have further well data or current water levels of the wetlands be monitored now. This would tell historic water table values in the wetland to monitor for post construction changes.

TRAFFIC

Invenenergy submitted a traffic report entitled "Traffic Impact Study for the Clear River Energy Center" dated May 2016 and prepared by McMahon Transportation Engineers and Planners. CDR Maguire reviewed this report and provided comments in our June 9, 2016 review letter.

We appreciate the opportunity to assist the Town of Burrillville with these issues. If you have questions please contact me at your convenience

Very truly yours,

CDR MAGUIRE INC.



James A Jackson, P.E.
Project Manager

Cc: Michael Wood, Burrillville Town Manager
Thomas Kravitz, Burrillville Town Planner