



Burrillville Land Trust

Protecting our open space and rural character
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Director Janet Coit
Rhode Island Department of Environmental Management
% EC4/Science and Technical Advisory Board
235 Promenade Street
Providence, Rhode Island 02908-5767

Using the STAB to evaluate and advise on the Major Source Permit by the
Clear River Energy Center

Dear Director Coit,

As you know, on May 8, 2019, the State of Rhode Island and Providence Plantations Department of Environmental Management Office of Air Resources issued a Preliminary determination or Draft report for a major source permit for the Clear River Energy Center: aka - the Invenergy Project.

The application for the Major Source Permit was submitted to DEM Office of Air Resources on May 1, 2019.

I'm asking the EC4 - Science and Technical Advisory Board to review the application, review the standards that could be used in evaluating the application, and offer science and technical advise to the Office of Air Resources on this specific application.

I'm also asking that if my request is granted, that the review of the application take place soon and the advice or comments be submitted no later than 4:00 PM, Monday, July 15, 2019, at which time the public comment period will close for this application review.

As suggested by the authority given to both the EC4 and the STAB, both are allowed to offer advice to state agencies as to the latest scientific information to reduce greenhouse gas emissions and offer mitigation strategies that would get us to the reduction targets set forth by Public Law Title 42 Chapter 42-6.2 Resilient Rhode Island Act of 2014.

Here is what I believe that gives the EC4 and STAB the authority to review the application and make recommendations and offer advice to the Office of Air Resources:

As suggested by public law Title 42 Chapter 42-6.2 Section 42-6.2-2 number (1) which states in part that the EC4/STAB can...(1) Assess, integrate, and coordinate climate change efforts throughout state agencies to reduce emissions, strengthen the resilience of communities, and prepare for the effects of climate change; and, section 42-6.2-3 number (1) which states in part, ...

To support the council's work, state agencies shall: Assist the council in implementing the provisions of this chapter; and number (2) Develop short-and long-term greenhouse gas emission reduction strategies and track the progress of these strategies; and Section 42-6.2-4 line (f) number (2) which states in part "Assist the council in improving public access to, and understanding of, the best available scientific, technical, and other information about climate change, mitigation, adaptation, etc., so as to build public support for, and participation in, initiatives to make communities more resilient; and Section 42-6.2-5 numbers (2) which states in part, "...advise the council regarding opportunities to provide timely support for key policy and management decisions by aligning academic research around issues of climate change and resiliency; number (3) Inventory the scientific and technical work being done by public-and private-sector entities, and evaluate options to coordinate or integrate/consolidate such work in order to achieve greater efficiency, save resources, and provide better services; number (4) Make recommendations and provide policy advice to the council regarding research needs and priorities, resource allocation, and funding opportunities; and number (5) Assist the council in communicating scientific and technical information to key user groups and the general public.

I ask that you review public law CHAPTER 42-6.2 Resilient Rhode Island Act of 2014 for that authority which I believe is there to review an application that will have direct impact on the emissions targets of the Resilient Rhode Island Act of 2014.

With this review, the EC4/STAB can establish a working model for all major source emissions productions now and in the future.

I eagerly await your response.
Sincerely,

Paul A. Roselli