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March 1, 2017

Chair Meg Curran
Director Janet Colt
Director Parag Agrawal
Energy Facility Siting Board, via email

Dear Chair Curran, Director Colt, and Director Agrawal,

Re: Waterfront changes and the record on power lines burial being feasible and divisible

I am writing to urge you to review three crucial aspects of the waterfront power lines issue which we believe the Board has overlooked: the significant changes on the waterfront since the 2004 Settlement Agreement was signed; statements in the record that that burial is “feasible,” “constructible,” and “aligned with standard industry practice”; and evidence that it is divisible.

Since National Grid proposes to replace 100-year-old towers with new ones, your decision on burying these lines will shape our waterfront for the next century.

1. The Board should review of the economic, social and environmental benefits of burial in light of the significant changes on the waterfront in the last 13 years.

State law mandates that the Board grant a license “only upon finding that...the proposed facility will not cause unacceptable harm to the environment and will **enhance the socio-economic fabric of the state.**” (RIGL 42-98-11 (b) (3); bold added.) The significant changes on the waterfront since the Board issued its finding in 2004 warrant the Board reviewing that finding so that it takes into account the waterfront as it is today.

Changes on the waterfront include:

- the marketing of I-195 lands, many with views of the power lines that depress property values, including views from a proposed residential tower that would overlook the waterfront
- the re-establishment of the Newport ferry at the former Shooters site and proposed central market with restaurants at the site in the shadow of the power lines
- other new developments with particularly conspicuous and economically deleterious views of the wires, such as:
 - the upgraded Hilton Garden Inn adjacent to the enhanced India Point Park, which the Parks Department estimates is used by more than 150,000 people annually
 - the popular linear park over the Seekonk River
 - the Tockwotton facility
 - the planned concert venue at Bold Point Park in East Providence where the power lines conspicuously detract from views of the city skyline.

Surely state law does not intend the Board to base its assessment of what enhances the socio-economic fabric of the State on outdated information. A **thorough cost/benefit analysis** of the economic, social, and environmental benefits of burial, including increased tourism, property values, and municipal tax base over the next 100 years, is essential for the Board to accurately evaluate the burial proposal. We urge the Board to commission such an analysis as soon as possible. By leaving it up to the parties to decide whether to bury the lines, the Board is abrogating its responsibility to consider the full impact of its 100-year decision.

2. The record shows that three consultants have determined that burying the waterfront power lines is feasible, and that RIDOT has not concluded that using the bridges is not feasible.

The Board was mistaken in stating at its February 16th meeting that the record shows burial is not feasible. In its attached report (pp. 3-4), the National Grid-approved consultant Power Engineers (1) stated that a horizontal directional drilling (HDD) contractor's review of the data showed "the alignments were considered **feasible** for construction," and (2) concluded that the burial project "is **aligned with standard industry practice** and is **constructible**" (bold added).

PDC, another consultant who reviewed the project, said it was "in general agreement" with Power Engineers and also found the project to be "aligned with standard industry practice" (p. 12 of the attached PDC report).

We urge the Board to find out the identity and credentials of the "HDD consultant" who reviewed the burial project and considered it "feasible." The consultant could put in perspective National Grid engineers' testimony which has consistently emphasized the risks and uncertainties of horizontal directional drilling (HDD), without acknowledging the **significant advances in HDD accuracy** in recent years. (A 12/16 article about such advances is available at <https://trenchlesstechnology.com/directional-drilling-tracking-guiding-101/>.) We can recommend to the Board another HDD expert who believes that the consultants' reports tend to reflect National Grid's "no-can-do, chicken little" attitude toward burial.

South Carolina Electric and Gas is an example of an investor-owned utility that has relied on HDD advances and three times has successfully buried 7,000-feet of high-voltage power lines under Charleston harbor over a distance nearly seven times longer than the proposed route under the Providence River. We can provide the Board with a contact at SCE&G.

Regarding using the bridges, National Grid continues to testify falsely that the RI Department of Transportation (RIDOT) said it was not feasible to attach the wires to the I-195 Providence River bridge. In fact RIDOT's chief engineer at the time testified that he did not know if using the Providence River bridge is feasible and "would have to investigate." The Public Utility Commission's advisory opinion confirmed RIDOT's testimony. (See p. 1 of our attached memo.)

3. The Board is mistaken in thinking that ruling on the feasibility of the burial route is an all-or-nothing proposition.

In fact, the record shows that the burial route consists of three distinct, divisible sections, some more problematic and costly than others. We urge the Board to take that fact into account before ruling on the feasibility of the entire burial project.

A) Between the rivers: Burial along India Point Park presents none of the challenges, risks and costs associated with HDD under the rivers, or with attaching lines to the highway bridges. Accommodating existing sewer lines under India Street has not been shown to be an unsurmountable challenge, and the “cut and cover” method that would be used on this section is relatively straight forward and would minimize disruption.

Burying the lines only between the rivers would likely not require acquiring land for transition stations: one could be built on the eastern bank of the Providence River where pole #2 now stands, and another on the western bank of the Seekonk, on RIDOT land near the Brown Boathouse where NG proposes to build a new tower if the lines remain overhead. (On the attached map, see “Temp. pole 2.” The RIDOT land is near the river, directly east of what was then the “Radisson Hotel.”)

B) The Seekonk River: the bridge appears to present fewer challenges than the Providence River bridge for attaching the lines, and the burial route would be shorter (950 feet) and in “more favorable” conditions than burial under the Providence River, according to p. 8 of PDC’s attached report. Using the RIDOT land referred to above and a land swap planned by East Providence on the eastern bank would also likely avoid acquisition costs for transition stations for the Seekonk River crossing.

C) The Providence River may be the most problematic: its bridge appears to present more significant challenges for carrying the wires than the Washington Bridge over the Seekonk. The burial route under the Providence River would be longer than under the Seekonk, could be riskier, and could require (depending on the route chosen) acquiring an easement for the parcel next to Al Forno restaurant. (In that regard, National Grid has falsely testified that this parcel would have to be acquired and condemned; in fact, its owner has testified that he is amenable to National Grid acquiring an easement for the necessary manhole cover, which it has been shown would be unlikely to significantly impede developing his property.)


Benefits of partial burial: Significant benefits of burying the lines between the rivers and under or alongside the Washington Bridge include:

- removing the antiquated 100-year-old Seekonk towers, which must be replaced
- increased tourism, property values and municipal tax bases over 100 years resulting from greatly improving the views from India Point Park, Fox Point, downtown, and Bold Point Park and the Tockwotton in East Providence.
- If the overhead Seekonk crossing can be avoided, the views will also greatly improve along the East Providence waterfront’s developable land, the Seekonk linear park, and I-195, which is the gateway to Providence for millions of travelers.

Cost: The \$27 million that could be available for the burial project might well cover burying the wires between the rivers and a new Seekonk River crossing, whether underground, attached to the Washington Bridge, or if need be, overhead. The \$27 million total could come from the \$16.5 million already raised for burial and the \$10.5 million estimated cost of a new overhead Seekonk crossing, which National Grid presumably will ask ISO New England to contribute to the project, updating the \$1.5 million it agreed to contribute in 2006. ISO's commitment is to pay for an overhead replacement of the antiquated Seekonk River crossing, on the understanding that those funds could be contributed to replacing that crossing by burying the line under the River or attaching it to the Washington Bridge.

Thank you for considering our views on the waterfront power lines issue. We hope this perspective is helpful to the Board and would be glad to answer any questions.

Sincerely,



David Riley
Co-Chair, Friends of India Point Park

Attachments:

- Power Engineers report on burial project
- PDC report on the project
- FIPP 10/20/17 memo
- Map of burial route