



76 Riverview Ave.
Groton, CT 06340

To: The Groton Town Council
Re: Why We Need to Delay Action on New England Edge's Proposal to Build a Data Center in Groton
February 20, 2022

Dear Mayor Melendez and Members of the Groton Town Council,

We are writing to request that you postpone a vote on the proposed agreement with Thomas Quinn of New England Edge to place a data center in Groton until the town has more information and a site-specific proposal. In our view, there is too much critical information missing for the town to decide so quickly on the NE Edge proposal. The consequences of moving forward without this necessary information could have significant harmful impacts on our town, our environment, and our taxpayers. It concerns us that this situation is so similar to the one the town got mired in with Jeffrey Respler and the Mystic Oral School. There is not enough information about the project leader, Mr. Quinn, his past record, his company, or the proposal to make an informed decision. It would be expected that the Groton Town Council would avoid running headlong into another major transfer of the town's resources to an unknown entity for a 20/30-year partnership without due diligence.

The appropriate process for pursuing this project is for NE Edge to first go before the Planning and Zoning Commission and the Inland Wetlands Agency with the proper detailed plans to seek their approval. If those permits are acquired, then it would be appropriate for the Town Council to consider signing an agreement with the full specific plans and evidence that the project will benefit the town.

Already the town is in an unfortunate situation with GotSpace, the company Thomas Quinn has recently extricated himself from. The town has an agreement with GotSpace for another proposed data center on Rte. 117. Both the company and the project appear to be in free fall. The town could be left with having spent considerable funds on a non-project. Will that happen again?

The Council should take a serious look at the Rte. 117 GotSpace agreement to see what protections it afforded the town. We would suggest not many. The company can pass the project off to another entity without the Council's approval. There is no requirement for mitigation on the property should the project be abandoned.

Answers the Council and the public need to have before approving an agreement with NE Edge

- What exactly is the town getting out of this agreement? Where is the cost-benefit analysis that will tell us whether it economically makes sense? Who is paying for running water, electric and sewer to the property? Taxpayers? Or NE Edge? An economic analysis should be done on an annual basis to better evaluate the benefit to the town.

- What is Mr. Quinn's business record? What is his relevant experience with developing data centers, given that he has never built one? What has he done that would make him appropriate for an agreement with Groton worth perhaps millions of dollars that lasts 20-30 years?
- Who is going to build and run the proposed data center, and what is their track record?
- What protection does the town have if NE Edge or whoever next manages this project goes belly up or abandons the project?
- How many buildings does NE Edge plan to build on the property and what size? Mr. Quinn suggested one or two at 250,000 square feet each. That is a HUGE amount of space, approximately 12 acres. Does NE Edge have plans for expansion beyond one building? If so, where?
- What companies will use this data center? The two closest large companies, Electric Boat and Pfizer, have their own data centers. Would they use it? Where is NE Edge's clientele?

Environmental Concerns and Questions

The Holstein property (see map) is comprised of a series of rocky ridges and hilltops with gullies in between containing considerable wetlands, including some headwaters of Fort Hill Brook, which runs through the Sheep Farm next door and beyond into Long Island Sound. There is a reason this property, for sale for a very long time, has not sold. It is extremely difficult and expensive to develop. To build a data center there, several bedrock ridges and hilltops dotting the property would have to be leveled, with considerable impact on the wetlands and streams.

- Why would NE Edge buy the entire property if it is only planning to develop the flatter 10% near Flanders Rd.? How would it develop the rest? Or would it give/sell it to the town?

Mr. Quinn proposes swapping or donating a small portion of the western half of the property (part of parcel #1), which is heavily covered by wetlands, for the town-owned slice along Flanders Rd. Since the western half is generally not developable, we question whether this would be an equitable swap. More of the western portion of Parcel #3 should be included, especially the southern wetlands and ridges to the west in parcel #3.

An environmental impact study is needed to assess:

- The impact on the streams and wetlands on the property, especially the tributary to Fort Hill Brook, which runs through the abutting Sheep Farm property down to Long Island Sound.
- The impact of noise and air pollution on the intensive existing housing to the northeast.

A detailed plan should be presented that includes:

- A footprint for the building(s) and where it (they) will be. How many square feet? How many stories? A run-off containment plan? How close to streams or wetlands? Fuel type

and storage. Source and amount of electric power needed. Location of 100-car parking lot. This is why this project should go to Planning and Zoning and the IWA first.

Other key environmental elements that should be required by the town in the agreement:

- This project should be carbon neutral. The Town should require that NE Edge do whatever it takes to achieve that neutrality. Last year, the Groton Town Council committed to avoid contributing to greenhouse gas emissions through its activities and programs. And the town needs to be working toward the state goal of 45% reduction of GHG by 2030. A data center will add substantially to greenhouse gas emissions.
- Solar panels on the roof.
- Protection for Groton's water supply in times of drought and a closed-loop water cooling system.
- Noise abatement measures to reduce decibel levels.
- Pollution management and control, including stringent control on diesel fuel and batteries in enclosed spaces, using fuel cells instead of batteries, and proof of an approved battery recycling program.
- Management plan for the heat generated by the operations, which will be substantial, and pollution generated by running generators for regular maintenance and/or during power outages.

The questions we have raised here have serious consequences for Groton's environment and finances. We respectfully urge the Council to not sign an agreement until the town has shared with the public a known net benefit to the town, and the project has gone through the permitting process of the Inlands Wetlands Agency and the Planning and Zoning Commission.

Respectfully,

Elizabeth Raisbeck and Eugenia Villagra, Co-Chairs
Groton Conservation Advocates