



March 1, 2021

To: Members of the Town Council; John Burt, Town Manager; Larry Dunn, Chair of the Groton Conservation Commission; and Bill Groves, Chair of the Groton Economic Development Commission

From: Elizabeth Raisbeck and Eugenia Villagra
Co-chairs, Groton Conservation Advocates

Re: Critical Unanswered Questions about the NE Edge Data Center Proposal

Over three public meetings, Mr. Quinn has dribbled out bits of information about his plans to build a data center on Flanders Rd. On Feb. 24th the public finally learned where the data center will be located, that they will have to level the granite hilltops and ridges on the property to build it, that it will affect far more than the 5 -10 acres of the center itself, and that there is now no baseline data on the impacts of placing a data center there related to noise, water quality, wetlands and streams, rare and endangered species, air pollution, and global warming.

While we now have more information about Mr. Quinn's proposal, we believe the Town Council does not have nearly enough information to move forward with approval of a Qualified Data Center Host Municipal Fee Agreement at this time. We respectfully urge the Council to require Mr. Quinn to submit a full project description before voting on whether and how to move forward with an agreement. Failure to understand the full ramifications of this project could have significant harmful impact on Groton's taxpayers, the neighbors of the data center, and the local environment including the abutting Sheep Farm and Sheep Farm South, town open space, Bluff Point and Long Island Sound, as well as global warming. An environmental impact study is needed to determine the impacts of the data center on these sensitive environments. We continue to believe that a plan should be presented to the Council that lays out the specifics of building and operating the data center and the net benefit to the town, which should be assessed on an annual basis.

We remind the Council that it agreed in 2021 to take into account the impact of the town's actions on climate change—"to actively promote and employ resiliency and sustainability principles." So far, this draft agreement to move forward with a data center in Groton totally fails to meet or even address these principles.

Furthermore, enough questions have been raised about Mr. Quinn's past business dealings that the Council should pursue answers about his role and actions in the Montville failed data center project. While he claims to have been only a consultant to GotSpace Data Partners or Verde Group, a Memorandum of Law filed on November 29, 2021, in a litigation related to the Montville project "... alleges that the Plaintiff (through its principles and/or one of its agents, Thomas Quinn) knowingly and intentionally

interfered with a business relationship that Verde Group had established with the Mashantucket Pequot Tribal Nation concerning data centers.” Town staff could easily follow up with a phone call to counsel in the litigation. Several news articles also identify Mr. Quinn as CEO and President of Verde Group, the organizer of the Montville project.

Enough questions have been raised about Mr. Quinn’s past business dealings that the Council needs to produce answers before going forward with the host agreement. Can we assume once the agreement with Groton is signed, he will sell the property to one or more companies, collect his fee and disappear? If so, what company will he sell to and what is their track record? Do we have any guarantees that he will lead the project through to the operational phase? Does he have any qualifications to do that? And do you feel he has the integrity required for leadership of such a major project in Groton?

Mr. Quinn has educated us on what a competitive business it is to bring data centers to the Northeast and that New England is the new pioneer territory of data center location. The Council should consider that there will be other companies knocking on our door if the Council determines that NE Edge has not sufficiently answered its questions.

Areas of Concern:

Noise: The Council should require an independent study of the noise effect of the humming computers, the generators when they are used, and increased traffic on Flanders Rd. We do not know if the Wallingford study appropriately covers the needs of the data center’s neighbors. Do we even know how many Tier 4 and Tier 2 generators are planned?

Blasting: Besides the noise of blasting, what effect will the blasting have on wells in the area and groundwater streams feeding wetlands? NE Edge should guarantee well damage repair.

Leveling the hilltops and ridges: The Council should ask for a plan describing how they will level the environmentally sensitive ridges and hilltops on the Holstein property that will not damage the streams feeding Fort Hill Brook, their associated wetlands, and Fort Hill Brook flowing into Long Island Sound. Is it even possible to do that?

Stormwater Runoff and Pollution: The 14-acre development site will create a huge impervious area causing significant runoff and pollution from the parking lot and potentially from the roof. A massive storm-water management system will be required to prevent polluted runoff from entering the streams and wetlands.

Air Pollution and Global Warming: Diesel fueled generators pollute and contribute significantly to global warming. We strongly urge the Council to disallow Tier 2 generators on the site. Tier 4 generators will contribute far less to global warming, as nitrous oxide, soot, and CO2 emissions from Tier 4 generators are 90% lower than those from Tier 2. Tier 4 has been the industry standard since 2015.

Also, Groton should require that the generators be used only for emergency back-up and not be allowed to replace Groton Utilities’ power during peak hot periods in the summer, as stated by Mr. Quinn. This practice will contribute unnecessarily to a heat island effect in the neighborhood and global warming overall, a sacrifice we shouldn’t make to cut energy costs for the data center owner.

| **Green Standards:** The draft agreement cites several possible environmental standards but only two, LEED and ISO 5001, are appropriate for building and operations at this site. Gold Star, for example, refers primarily to appliances, and Breeam is a set of standards appropriate to Great Britain.

No Business Plan: The town needs to do a thorough cost-benefit analysis that will tell us if this agreement makes economic sense. What is the lost revenue from taxes for 20-30 years? The analysis should be done on an annual basis to better evaluate if and when there will be any benefit to the town, the scope of any losses and when, if ever, it might be profitable. Also, the town should put into a host agreement that NE Edge will bear the costs of running electric, water and sewer to the property. In sum, what exactly are the taxpayers and the Town getting out of this proposal?

We strongly urge the Council to require a much more specific plan which provides answers to these questions as well other questions regarding the size, shape and location of the buildings, access roads, utilities and other infrastructure, number of generators and type, battery disposal, and who is responsible for remediation of the site should it be abandoned or when its life use is over.

Groton Conservation Advocates would be more than willing to flesh out the details of these questions as needed.