

Groton Open Space Association, Inc.

P.O. Box 9187, Groton, CT 06340-9187

www.GOSAonline.org



To: Town of Groton Town Council

From: Joan Smith, 37 Island Circle South, Groton CT

Subject: Proposed Data Center Host Agreement for Flanders and Hazelnut Hill Road properties

Date: March 16, 2022

Groton Open Space Association, (GOSA) owns two nature preserve properties abutting the southern boundary of the proposed NE Edge data center property. We were surprised to see that Building #3 was placed next to the Sheep Farm South boundary line in the revised host fee agreement's conceptual map. The applicant had suggested at the public meeting that that the proposed data centers would be tucked close to I-95 to avoid negative impacts to neighboring properties. Visitors to Sheep Farm South now would have no choice but to look down upon the rooftop, parking lot and roads from high above the proposed site. Light, sounds, vibrations, diesel exhaust, and views of the rooftop mechanics would not be hidden by the parapet, and would all impair the recreational enjoyment and conservation values of the nature preserve.

We recommend that the proposed sound study in the revised agreement not only include neighborhood buildings, and human schedules, but also an expert analysis of impacts to wildlife and the nature preserve. For example, migrating and other birds require sound for mating and territorial defense. Many species use sound for hunting. Lights, noise and 24-hour activity would disturb nocturnal wildlife activity, and light up our dark skies.

In addition to direct habitat destruction, there would be a high probability of disturbance to wetlands and wildlife from building and road construction. The bedrock ridgeline, where the connector road would head from building #3 to the northern buildings, contains streams, wet terrain, and what should be a protective vernal pool buffer. The ridge is shaped like a narrow peninsula, with steep sides sloping toward wetlands and streams on three sides, and features two crossing streams on the fourth side. Massive regrading to create a large flat area for the data center buildings would impact surface and underground water flows. A 14-acre roof and parking lot, for one building alone, would produce 510,000 gallons of stormwater runoff after only one inch of rain. Pollutants from the roof would contain nitrogen and phosphorus from atmospheric deposition would require extensive pretreatment engineering to avoid polluting groundwater and the nearby reservoirs.

A spectacular view from the Sheep Farm South of the steep hillside featuring a glacial boulder train, mossy stones, seeps, a small ravine, a brook, a stonewall boundary, and a rocky upland knob with possible Native American stonework would be ruined. The quiet beauty and peacefulness of nature would be lost, and with it, recreational value, wildlife habitats, water quality, air quality and night skies.

There could also be archaeological disturbances. The entire district including the project site is

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eligible for nomination as a registered national historic site for its archaeological resources.

There is pre-colonial, colonial and Battle of Mystic history, already well documented on neighboring properties. Fort Hill, high above the project site, is the site of Fort Weinsauks, base for Great Sachem Sassacus, from the pre-colonial period when the Pequot tribe dominated the area. Sassacus proceeded to Mystic to join in the 1737 battle, and suffered the retreat from Mystic to the Thames River.

GOSA has an open mind to see if environmental preservation, archaeological preservation and data center development could be compatible. I recommend that the Town Council resist pressure to decide quickly, and to take its take time to evaluate the host fee agreement, the promised financial benefit, the applicant's reported history, his financial backing, the risk of litigation, and potential environmental harm. The community deserves a more transparent and detailed plan before any decision is made to move forward.

Thank-you for your time and consideration,

A handwritten signature in black ink that reads "Joan H. Smith". The signature is written in a cursive style.

Joan Smith, President
Groton Open Space Association
gosamail@gmail.com