

## **Martella, Joseph (DEM)**

---

**From:** No LNG in PVD <noLnginpvd@gmail.com>  
**Sent:** Tuesday, October 10, 2017 12:40 AM  
**To:** Martella, Joseph (DEM)  
**Cc:** Coit, Janet (DEM); Hellested, Leo (DEM); Owens, Kelly (DEM)  
**Subject:** [EXTERNAL] : STRAPs File No. SR-28-1152

Dear Mr. Martella

The No LNG in PVD coalition, based on National Grid's continued inability to follow DEM's public involvement regulations, again formally requests that DEM denies the STRAP permits for the proposed liquefaction project located at 121 Terminal Road/125 Terminal Road/642 Allens Avenue, Providence, RI (File No. SR-28-1152). Public meetings were held on July 13 and August 9, 2017 regarding the project. National Grid took 84 and 57 days respectively to provide the written summary of the public meetings. Per 7.07(C) of the Remediation Regulations (DEM-DSR-01-93), "A written summary of all public meetings must be submitted to the Department in both hard copy and electronic format by the Performing Party within 72 hours of the meeting." National Grid submitting the written summary of two public meetings 81 and 54 days after the regulations require, along with their continual disregard for following the Remediation Regulations is justification for DEM to deny the STRAPs.

These failures to follow regulations along with the additional attempts to dissuade public involvement described below, should at the very least be reason to delay consideration until which time members of the public and advocates have time to review and provide comment on the meeting summaries as well as the more than 500 pages of simultaneous responses and new questions from both National Grid and DEM. The Public Involvement Plan for the above mentioned STRAP requires the public petitioners to be considered "equal participants" in this process. The coordinated efforts of National Grid and DEM to exclude the public from the process and communicate only with each other and release all of the documents to the public at once, moments before the close of business on a Friday before a long weekend is not only deceptive, it is a clear failure to abide by DEM regulations.

On October 5, 2017 National Grid submitted a 497 page document "Meeting Summary, Response to Public comments and Additional Clarifications Short Term Response Action Plan (STRAP): Proposed Liquefaction Project STRAP Addendum: Holcim Driveway". DEM Office of Waste Management managed to review and provide 12 pages of comments on the 497 page document a day later on October 6, 2017. Minutes later and at the close of business on a Friday before a holiday weekend DEM also released a new set of clarifying questions asking National Grid to respond on or before October 11, 2017, only two business days later. It would appear, especially if National Grid is able to respond in such a short time, that National Grid and DEM colluded to communicate with each other without public participation and fast track the finalizing of the STRAP. As the community is supposed to be an "equal participant" in the process, we request sufficient time to review and provide comment on the 497 page document, Office of Waste Management's responses as well as their additional request for comments. The initial STRAP application dated May 12, 2017 was 303 pages. As the new information is larger than the original application we request that public comment period is reopened to the length of the time it took for National Grid to respond, 84 days, and a new public hearing be held within the effected community to inform the public of any changes and provide the public with an opportunity to comment on the potentially revised proposal.

The No LNG in PVD coalition continues to urge DEM to deny the STRAPs as National Grid has continued to avoid following the Remediation Regulations and disregards public involvement.

Sincerely,

No LNG in PVD