

December 4, 2017



Neal Personeus
RI DEM Office of Water, Water Quality Cert
235 Promenade Street
Providence, RI 02908

Re: file # 16-171

Dear Mr. Personeus:

Having reviewed the file for the proposed stormwater component of the proposed LNG liquefaction facility at 642 Allens Avenue, Providence, Rhode Island, I offer the following comments.

The plans indicate that the outflow pipe from the proposed stormwater mitigation is 6.5 feet above mean highwater, listed as 2.12 NAVD.

1. Mean is an average and thus the effective drainage of the outflow in any high tide, any spring/moon high tide, or are any sea-level rise projections is not indicated.
2. The roadway is indicated at 20 feet above NAVD; the sand filter occupies space between 7 and 9 feet NAVD. How will these be affected by various peak tides?
3. There is a statement that "Run-off by pass line has the capacity to safely convey 10 year storm event. What are the precipitation data for this event?

What level will water reach in various tide scenarios? In storm or hurricane scenarios? Not only for drainage from the stormwater run-off mitigation, but beyond the scope of this permit to a waterside facility for liquefaction?

I ask that the permit application be required to list:

1. The peak monthly spring/ moon tide for this location for a full 12 months.
2. The projected sea-level rise peak tides for this location, including apogee conditions.
3. The stormwater drainage effectiveness in each of these extreme scenarios
4. The data used for 10-year storm event to assess drainage effectiveness at peak tide and storm conditions in the 24-hour event

And to show for each of these conditions the potential for runoff from the road or accumulated water and sediments from the stormwater basin to drain into the waters of Providence River.

Thank you for this opportunity to comment.

Sincerely,

Eugenia Marks, M.A. Environmental Studies, Brown University