

[LETTERHEAD]

July 24, 2018

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, DC 20426

**Re: Environmental Assessment for the Fields Point Liquefaction Project (Docket number CP16-121-000)**

Dear Secretary Bose,

The Rhode Island Department of Health (RIDOH) submits this letter to Federal Energy Regulatory Commission (FERC) regarding the Environmental Assessment (EA) for the proposed Fields Point Liquefaction Project. Our comments focus in two areas. First, we build on our earlier suggestion that the use of a health impact assessment (HIA) as an alternate approach to assessing this project might better satisfy the residents of the region that FERC hears their voices and is concerned about their health within the broader context of injustices that have occurred in this region. Second, we address specific safety issues that we would like FERC to consider.

### **Health Impact Assessment**

We understand that based on the traditional NEPA approval process, the Environmental Assessment has not identified major environmental or safety issues. However, that traditional process does not look at the broader picture, including the history and future of this region. The Port of Providence has a long history of environmental problems that concentrate many of Rhode Island's most concerning pollution and safety issues in neighborhoods that are economically and racially disadvantaged. Because of that history, the residents of the area feel disenfranchised and believe that their voices and health do not matter to government. Although the current project does not appear to make those pollution and safety problems substantially worse, it continues that historical pattern of discounting the voices of the people that live in the region and sets a precedent that may lead to additional, more concerning, projects in the future.

To more broadly consider the longer-term impacts of this project, RIDOH again suggests that FERC conduct a full HIA. An HIA is means of assessing the health impacts of a proposed policy or project using quantitative, qualitative and participatory techniques. The HIA process involves robust public engagement, which includes working with the affected community to identify additional areas of concern, to collect new sources of evidence, and to develop recommendations on how to mitigate potential harms and enhance positive health impacts. Because its scope is broader than the NEPA process, it allows for the identification of possible alternatives not

previously considered. Ultimately, an HIA can lead to a more transparent decision-making process that builds consensus.

Robust engagement with the public is important to ensure that government does not overlook the public's legitimate concerns, and to ensure that people affected by a project feel their voices are being actively listened to. In addition, these public engagement processes might lead to new alternatives or new environmental or safety issues that were not examined in the original environmental assessment. RIDOH encourages FERC and National Grid to meet with community leaders to listen to their concerns and convince them that those concerns are being addressed. We also encourage the inclusion of additional town hall meetings to provide the general public with opportunities to have their voices heard. RIDOH staff are available to help facilitate both types of meetings. These engagement processes would be performed as part of a full HIA, but we suggest that FERC conduct them even if further formal assessment of this project is deemed unnecessary.

## **Public Safety**

The proposed project is in a location that warrants particular attention to public safety issues, given its neighboring industrial facilities, the surrounding dense neighborhood, and the nearby concentration of critical health system infrastructure. Particularly given this location, evaluating low probability but high impact scenarios (worst case scenarios) is needed to properly assess risk to public health and then avoid or mitigate those risks.

From this perspective, RIDOH notes that the Environmental Assessment lacked analysis in the following areas. We request that FERC address these gaps prior to reaching a decision on the proposed project, and weigh carefully the identified risks against the proposed need:

- Conduct a risk assessment of potential ignition sources both on-site and in the surrounding area.
- Conduct modeling of a boiling liquid expanding vapor explosion (BLEVE) scenario's impacts to surrounding area, especially to surrounding critical healthcare infrastructure
- Assess impacts of a BLEVE scenario on other LNG tanks/infrastructure in the surrounding area, especially with respect to cascading effects
- Conduct plume/air dispersion modeling of a breach scenario's impacts to surrounding area, especially to critical healthcare infrastructure
- Evaluate a more conservative and protective sea level rise scenario (Intermediate-High or High) in NOAA (2017) when setting the design criteria

Should the project be approved, RIDOH recommends that National Grid be required to do the following:

- Participate in relevant Local Emergency Planning Committee, Providence Emergency Management Agency's Hazard Mitigation Committee, and other relevant emergency preparedness and response bodies
- Participate in Providence Emergency Management Agency's and Rhode Island Emergency Management Agency's Hazard Vulnerability Analyses/Hazard Identification and Risk Assessments/Threat and Hazards Identification and Risk Assessments

- Conduct regular emergency response training and exercises with local public safety agencies, including (though not limited to) Providence Police and Fire Departments, Providence Emergency Management Agency, Rhode Island Emergency Management Agency, and Rhode Island Department of Environmental Management
- Provide site emergency response plans to local public safety agencies (fire and police), Providence Emergency Management Agency, Rhode Island Emergency Management Agency, and Rhode Island Department of Health for review. Include representation from these agencies in the planning process for future updates.

Thank you for your attention to these comments and for the work thus far to assess the proposed project and identify mitigating measures. As stated earlier, RIDOH is available to support FERC and our sister agencies as needed in implementing the recommendations listed above.

Sincerely,

Nicole Alexander-Scott, MD, MPH  
Director, Rhode Island Department of Health