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By E-mail:
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Ms. Stephanie Strength
Environmental Protection Specialist
USDA/RUS
1400 Independence Ave., SW.
Room 2244-S, Stop 1571
Washington, DC 20250-1571

Re: Comments re RUS public meeting held on January 28, 2015, in Arecibo, Puerto Rico regarding the Energy Answers' Incineration Facility in Arecibo

Dear Ms. Strength:

On January 28, 2015, Ingrid M. Vila Biaggi and Luis E. Rodríguez Rivera, representing Cambio¹, attended a public scoping meeting as part of RUS's EIS process related to the Energy Answers' Incineration Facility in Arecibo, Puerto Rico. In our experience of over twenty-five years participating in Federal and State rule-making processes, including NEPA and State EIS processes, we have never witnessed a public meeting that so underachieved its purpose of providing and receiving information as the referenced RUS public scoping meeting. Hence, for the reasons contained below, we respectfully request a new public scoping meeting in Arecibo, Puerto Rico, where the community members may offer verbal comments in a dignified and sensible setting.


Relevant Facts and Arguments

Several community members arrived at 2:00pm at the site in Arecibo selected by RUS for the public scoping meeting scheduled for 3:00pm. At the meeting place, they found RUS employees together with proponent Energy Answers' representatives. A person who identified themselves as an Energy Answers' employee told them that they had to leave the meeting room and wait outside the gated grounds, in the street, until federal marshalls arrived, and that the marshalls would escort people five at a time into the meeting to provide their comments. Soon thereafter, three Homeland Security officers arrived and were posted at the building's entrance. The mere fact that RUS and Energy Answers' officials were meeting together prior to the public scoping

¹ Cambio is non-governmental organization whose mission is to promote responsible and sustainable development in Puerto Rico and the Caribbean Region.

meeting, in and of itself, caused great distrust among the community members. In addition, the fact that a representative of the proponent was exercising control over RUS's public scoping meeting added additional fuel to the communities' suspicions of foul play. Even more unbelievable was the fact that Homeland Security officers were called to control the meeting's entrance. In Puerto Rico, this federal police force is mostly associated with having jurisdiction over terrorist acts. Thus, the message sent to the community members was made sound and clear: they are dangerous; akin to terrorists. Besides representing an indignity and insult to community members, the presence of the Homeland Security police officers with the obvious intimidation effect their mere presence exudes, also served to set a confrontational atmosphere over RUS's meeting.

Once these issues were raised to RUS officials, the initial reaction was positive. Community members were assured that all could enter the meeting together and at the same time, RUS officials indicated they were in charge of the meeting, and two of the three Homeland Security police officers were instructed to stand outside the meeting room, while one remained in attention inside the same.



Approximately, 150 persons arrived to participate in what they thought was a public hearing where they would have an opportunity to voice their opposition and criticisms regarding the project. Once registration was completed, we all waited and waited, standing up as not enough seats were provided, for the meeting to begin; not clear of the reason why the RUS officials would not start the meeting. When we approached Stephanie Strength, person in charge for RUS, she very nicely and politely informed us that what we were participating in was an "open house" and not a "public meeting". Thus, she explained no microphones were available, nor was the room set-up to receive open public questions or comments regarding scoping. Nonetheless, RUS officials made clear they did not expect such a large turnout! Instead, maps of the proposed site for the incineration project were spread around the room, together with forms prepared by the proponent Energy Answers in which to write any questions or comments (forms ran out early during the meeting forcing RUS contractors to find where to copy more!), and an unidentified person with a hand-held recorder could be found, literally, in the meeting room's kitchenette waiting to record one person at a time. The recording space and set-up had the feeling of a confessionary! Moreover, Ms. Strength explained that RUS officials could not provide any answers or responses to the community members' questions as they had no information about the project, which raises the obvious question of why were they selected to lead a public scoping meeting on a very complex and controversial project that has the opposition of the majority of the community.

At this point, the community members attempted to voice their distrust of the process and requested that measures be taken so that everyone could hear all comments made during the meeting. Some used the maps to write words, such as farce, fraud, etc. and cross-out the proposed site on all the available maps next to the word "No". Ms. Strength attempted to speak through her interpreters with no success (of course, a microphone would have helped). Several of us attempted to help Ms. Strength explaining that regardless of what she called the meeting, open house or public meeting, the community needed to feel RUS was objectively listening to their concerns. Moreover, we explained that the "open house" set-up left the community

