



CITY OF PROVIDENCE

Jorge O. Eiorza, Mayor

Emma Rodvien
Coordinator,
Energy Facility Siting Board
89 Jefferson Boulevard
Warwick, RI 02888

Coordinator Rodvien and Members of the Energy Facility Siting Board,

The City of Providence urges the Energy Facility Siting Board (EFSB) to determine that the proposed Sea 3 expansion is an “alteration to a major energy facility” and therefore require a full application and review by the EFSB. This is the best way to ensure that all scenarios associated with the proposed expansion including impact to air quality, public safety, and the welfare of the community, are adequately reviewed. A full application and review by the EFSB is also the best way to ensure impacted communities and other stakeholders have the ability to comment on the application.

State law requires a full application and approval from the EFSB if the expansion is an “alteration” to the existing facility. According to Rhode Island General Law § 42-98-3(b), an “alteration” is “a significant modification to a major energy facility, which, as determined by the board, will result in a significant impact on the environment, or the public health, safety, and welfare.” The additional storage tanks and daily rail shipments proposed by Sea 3 Providence will increase the facility’s capacity to fuel trucks, increasing congestion and diesel emissions in the already congested and overburdened neighborhood. The neighboring communities of South Providence and Washington Park have some of the highest asthma rates in the state. They are also predominately low-income communities of color. Protecting these communities from the expansion of potentially harmful facilities is not only a matter of environmental protection, but also a matter of civil rights.

Expansion of this facility will contribute to climate pollution, which contradicts local and state climate targets that have been codified into law. Governor McKee recently signed into law the Act On Climate bill (Rhode Island General Law § 42-6.2), which sets mandatory and enforceable targets to eliminate climate pollution by 2050. It specifies that the State’s plan to meet this goal, as well as the interim targets, must prioritize addressing environmental justice issues and concerns. At the local level, Providence’s Climate Justice Plan outlines similar targets related to climate change with an even stronger commitment to protecting low-income communities of color who are most impacted by the climate crisis. The City Council is voting this week on Ordinance 30887, which will codify the City’s climate targets.

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Lastly, the City has a responsibility to address the emergency management and public safety concerns related to this proposed expansion. LPG is a highly dangerous and explosive substance. By expanding this facility, we are increasing the risk of a disaster like the San Juanico disaster that killed over 500 people and severely burned another 6,000 when several LPG storage tanks exploded near Mexico City. Given the variety of other harmful and dangerous substances stored and transported in and around that area, adding to this risk is negligent.

There are clear environmental, public health, and safety impacts related to the proposed expansion of Sea 3's Liquefied Propane Gas operations in Providence that merit a full review by the EFSB. I appreciate your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Elorza".

Mayor Jorge O. Elorza
City of Providence