



Emma Rodvien

Coordinator, Energy Facility Siting Board
89 Jefferson Blvd.
Warwick, RI 02888

May 23, 2021

Dear Members of the EFSB,

Green Energy Consumers Alliance is a nonprofit advocate based in Providence, Rhode Island and Boston, Massachusetts. We are dedicated to speeding the transition to a low-carbon energy system in New England. We help our thousands of members make sustainable energy choices, and we advocate for ambitious and practical state energy policy.

On behalf of our Rhode Island members, we urge the EFSB to deny the petition by Sea 3 Providence, LLC, which requests that the EFSB determine their proposed expansion as *not* an alteration to a major facility. We believe that the proposed alteration should be granted a full review from the EFSB.

As numerous other commenters have stated, the proposed expansion is significant, and it merits attention from the EFSB. The proposal merits even further attention because of the sensitive location in an environmental justice community and the cumulative impact of toxic industrial sites in this area.

According to the EFSB's rules and regulations, "alteration" means 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 Sea 3 facility is a major energy facility. The alterations proposed do not meet the definition of any of the alterations excluded by the EFSB's rules and regulations (445-RICR-00-00-1.3.4).

The proposed expansion would take up a significant amount of additional area in the neighborhood. It would bring an even greater amount of fossil fuels into the neighborhood, as well as the associated transportation—the tailpipe emissions of which are a driver of some of the highest asthma rates in the state.

The EFSB should carefully consider the proposal in light of Providence's Climate Justice Plan and Rhode Island's Act On Climate. Now is the time to think about how we can reduce fossil fuel infrastructure in the port of Providence, *not* consider its expansion.

We look forward to submitting comments once the EFSB in a docket for full review of this proposal.

Sincerely,

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