

Pedro Espinal
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May 6, 2021

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

Re: Sea 3 Providence, LLC Petition for Declaratory Order

Dear Ms. Rodvien and members of the Energy Facility Siting Board:

As you are aware, Sea 3 Providence, LLC (the applicant) is seeking a Declaratory Order from the Energy Facility Siting Board (EFSB) to allow for the import of Liquid Propane Gas (LPG) by rail. As the elected representative of Providence's Ward 10, I am writing to voice strong opposition to this proposal on behalf of the community of South Providence, and ask that the EFSB deny the applicants request for a Declaratory Order.

The applicant claims that the proposed expansion to allow for the import of LPG by rail does not require a full application or review by the EFSB because it is not an "alteration to a major energy facility." In order to make this finding, the EFSB would need to determine that the proposed modification will not result in a significant impact on the environment or the public health safety or welfare. The local community and I firmly believe that the proposed expansion of the existing operation poses a substantial risk both to the environment and to the public health, safety and welfare.

South Providence already experiences some of the highest Asthma rates in the state and increasing rail transportation and truck traffic in the area will only exacerbate this issue. If approved, this project would result in an additional 450,000 gallons of stored LPG at the site which will be transported by truck out to consumers. The applicant suggests that there is no increased risk to the public health and safety posed by the storage of 450,000 gallons of LPG, however if anything was to happen to the additional storage tanks, the trucks leaving the site, or to the rail cars transporting the LPG, there is no question it would result in an incredibly dangerous and harmful situation for local residents.

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The local community cannot afford this additional burden when for years they have been subjected to breathing toxins from the polluted air resulting from industrial operations in the Port of Providence. The proposed expansion of the LPG facility will create additional fire, health, and safety risks for the residents of South Providence who have historically been ignored and underrepresented in the decision-making process surrounding the most intensive industrial land uses in the State. We as a community have come together as one voice to clearly state that we do not support any expansion or development in the Port of Providence that may lead to increased safety risks for the local residents.

I would also like to take a moment to also highlight the environmental risks posed by this application. Climate change is a major concern for the State of Rhode Island due to its significant potential impacts on coastal areas, drinking water, economy, and health. The proposed increase in operations at this facility will undermine the concerted efforts made so far by the State of Rhode Island in building climate resilience. In addition to the work by the State, the City of Providence has also adopted a Climate Justice Plan incorporating the findings of the Rhode Island Department of Health regarding the high rates of childhood asthma and emergency department visits among children on Medicaid for the residential communities adjacent to the Port of Providence. The Climate Justice Plan sets forth concrete carbon-reduction targets, promotes the use of clean energy sources, and seeks to ensure a just and equitable transition away from fossil fuels. This proposal flies in the face of the dedicated work of communities across the State of Rhode Island as well as the City of Providence who are committed to addressing the risks of climate change by moving away from fossil fuel usage.

I respectfully request that the EFSB deny the applicant's request for a Declaratory Order as this proposal represents a significant threat to the environment and to the public health, safety, and welfare of the local community of South Providence.

Thank you for your consideration.

Sincerely,

Pedro Espinal
Councilman, Ward 10
President Pro Tempore, Providence City Council