

Rodvien, Emma (PUC)

From: Nirva LaFortune <nirvaward3@gmail.com>
Sent: Wednesday, May 26, 2021 9:55 AM
To: Rodvien, Emma (PUC)
Subject: [EXTERNAL] : Oppose Fossil Fuel Expansion and Environmental Racism in the Port of Providence

Dear EFSB,

My name is Councilwoman Nirva LaFortune from Providence City Council and I am submitting comments in favor of requiring a full review of the Sea 3 proposed Liquefied Propane Gas expansion.

I am calling on EFSB to do the following:

1. The Energy Facility Siting Board must determine that the Sea 3 Providence expansion is an “alteration to a major energy facility” and require a full application and review by the Board
2. The EFSB must extend the public comment period at least another 2 months
3. The EFSB must have the full review include cumulative health and safety impacts

This project, as an expansion of fossil fuel infrastructure in a heavily overburdened, BIPOC community, without robust public engagement no less, requires this.

First, 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.” Sea 3 denies it requires a full review but their application is self-contradictory. How can a facility that does not constitute an alteration of “an existing energy facility” be necessary “to meet the future demand for LPG in the region”?

Second, because the proposed expansion of this facility may result in a significant increase in diesel emissions within the Port area, which is already overburdened with polluting industrial activities and truck traffic, the potential growth in operations necessarily encourages and supports more use of fossil fuels. This is inconsistent with Rhode Island’s long-term climate change goals and binding emissions reductions as well as Providence’s Climate Justice Plan.

Third, because the proposal raises public safety concerns – it must be fully vetted by the EFSB before it is approved.

I urge the EFSB to require a full review of this fossil fuel expansion and to recognize the horrendous and disproportionate environmental impacts on the local communities by greenlighting this project.

Thank you,

Councilwoman Nirva LaFortune

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Nirva R. LaFortune | she/her |
Providence City Council,
Ward-3