

**STATE OF RHODE ISLAND  
ENERGY FACILITY SITING BOARD**

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IN RE: SEA 3 PROVIDENCE, LLC PETITION	)	
FOR DECLARATORY ORDER REGARDING	)	
THE RAIL SERVICE INCORPORATION	)	DOCKET SB-2021-03
PROJECT (PROVIDENCE, RI)	)	

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**PRE-FILED TESTIMONY OF  
CLARA F. DECERBO**

November 8, 2021

**TESTIMONY OF CLARA F. DECERBO**

1 Introduction

2 Q. Please state your full name and business address.

3 A. My name is Clara F. Decerbo. My business address is 591 Charles Street,  
4 Providence, Rhode Island.

5 Q. What is your position with the City of Providence (“the city” or “Providence”)?

6 A. I am the Director of the Providence Emergency Management Agency  
7 (“PEMA”) for the city.

8 Q. How long have you held that role?

9 A. Since March 2020. Before that I was the Deputy Director of PEMA, starting  
10 in April 2018.

11 Q. What are your responsibilities in that role?

12 A. I am responsible for leading, coordinating, and managing the city’s  
13 emergency management program, including mitigation, preparedness,  
14 response, and recovery activities. In my role I communicate, coordinate, and  
15 lead all emergency management activities with internal and external  
16 departments, agencies, and stakeholders, including city, state, private,  
17 nonprofit, and federal entities. I also manage the Emergency Operations  
18 Center (“EOC”) during any disaster activities as the EOC Director.

1 Q. What is your background before becoming the Director and Deputy Director  
2 of PEMA?

3 A. I concurrently serve as the Assistant Secretary of Preparedness and  
4 Response Information Management Section Chief (GS-13) for the U.S. Health  
5 and Human Services' National Disaster Medical System: Incident  
6 Management Team. Before I began working for the city, I worked for CDR  
7 Maguire as an Emergency Management Planner from June 2014 to April  
8 2018 and, before that, for the University of Rhode Island's Coastal Resources  
9 Center as a Sea Grant Marine Affairs Fellow. I am a Certified Emergency  
10 Manager (CEM®) from the International Association of Emergency Managers  
11 and completed the National Emergency Management Advanced Academy  
12 (Cohort 2020-2). *See Resume* (Appendix A).

13 Q. Are you familiar with Sea 3 Providence, LLC's ("Sea 3") petition for  
14 declaratory order filed in the Energy Facility Siting Board ("EFSB" or  
15 "Board")?

16 A. Yes.

17 Q. What is your understanding of that petition?

18 A. It is my understanding that Sea 3 is asking the EFSB to decline to exercise  
19 oversight over Sea 3's proposed rail service addition and other associated  
20 modifications to its liquid propane gas ("LPG") facility located in the Port of  
21 Providence ("ProvPort").

1 Q. What is the purpose of your testimony?

2 A. To urge the Board to exercise its statutory authority to oversee and decide  
3 whether to license the proposed modifications to Sea 3's LPG facility.

4 Q. Are you familiar with the area where the Sea 3 facility is located?

5 A. Yes, it is located at 25 Fields Point Drive in Providence, Rhode Island. I am  
6 familiar with the location of the Sea 3 facility inside ProvPort.

7 Q. Are you familiar with the City of Providence's Multi-Hazard Mitigation Plan?

8 A. Yes, when I served as Deputy Director of PEMA, I was responsible for  
9 directing and managing emergency planning activities including the Multi-  
10 Hazard Mitigation Plan. I also serve on the Providence Local Hazard  
11 Mitigation Committee. *See City of Providence Strategy for Reducing Risks*  
12 *from Natural, Human-Caused and Technological Hazards: A Multi-Hazard*  
13 *Mitigation Plan (April 2019)* (hereinafter, Appendix B).

14 Q. Based on your experience as Director of PEMA and knowledge of the Multi-  
15 Hazard Mitigation Plan, what can you tell us about the hazards presented by  
16 the Sea 3 facility?

17 A. Although I am not an expert in hazardous materials, I am aware that LPG is  
18 a hazardous and flammable material. Sea 3's facility is located 500 feet away  
19 from the largest chemical storage facility in the city and one mile from a  
20 liquified natural gas ("LNG") facility. The proximity of these hazards creates  
21 a potential for cascading hazard events in the event of a leak or explosion at

1 any one of them. *See Appendix B*, 73-74. The entirety of ProvPort, including  
2 the Sea 3 facility, is within a storm surge inundation area and an evacuation  
3 zone for a category 1 or 2 hurricane. *See Appendix B*, 36/51, Appendix A  
4 (thereto), Map 2.1. It is well-understood by the scientific community that  
5 climate change is expected to increase the frequency and intensity of  
6 hurricanes. *See id.* at 36. The Sea 3 facility within the port is located within  
7 the Federal Emergency Management Agency’s (“FEMA”) 100-year flood zone.  
8 *See Appendix B*, Appendix A (thereto), Map 2.2. FEMA flood zones include  
9 those areas expected to be inundated by categories 1 through 4 hurricanes.  
10 *See id.* at 43. In preparation for this testimony, I reviewed storm surge and  
11 sea level rise flooding models based on climate predictions, and the ProvPort  
12 area, which is unprotected by the Fox Point Hurricane Barrier, is likely to  
13 become increasingly vulnerable to storm surge inundation due to sea level  
14 rise in the coming years. A hurricane or flood event could adversely  
15 compromise the LPG facility and its safety measures.

16 Q. How will Sea 3’s proposed modifications to its facility impact Providence’s  
17 safety and hazard-mitigation planning?

18 A. The city’s 2019 Multi-Hazard Mitigation Plan utilizes the assumption that  
19 LPG is brought in by sea vessel and then trucked out. *See Appendix B*, at  
20 84/100. Accordingly, a change in the delivery method of LPG into the city  
21 would require a change in the city’s hazard response planning. Sea 3’s

1 proposed rail service addition would mean that LPG would be traveling by  
2 rail through densely settled areas where it previously was not, exposing those  
3 areas to additional risk. The recent derailment in Montana of an Amtrak  
4 train illustrates the type of risk accompanying rail delivery that was not  
5 present with delivery by vessel. While the police department currently  
6 provides detail services when LPG is delivered by sea vessel to the port, it is  
7 possible that police and/or fire escorts would be required for rail shipments—  
8 a burden to be borne by the city and possibly nearby municipalities as well.  
9 Additionally, it is my understanding that Sea 3's modifications are intended  
10 to expand its capacity, which means higher volume of LPG transport by  
11 tractor-trailers on our roadways and increased storage capacity at the port.  
12 The increased transport and storage of LPG would increase the likelihood of  
13 risks associated with that transport and storage.

14 Q. In your opinion, do the modifications that Sea 3 is proposing to make to its  
15 LPG facility pose significant potential impacts to the environment, and to the  
16 public health, safety and welfare of Providence's businesses and residents?

17 A. Yes.

18 Q. Does this conclude your pre-filed testimony?

19 A. Yes.