



May 7, 2021

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re: Docket #SB-2021-03 – Sea 3 Providence

Dear Members of the EFSB:

I write on behalf of the Environment Council of Rhode Island (ECRI), a coalition of over 70 environmental organizations, as well as individual members representing 50,000 people, who work to protect Rhode Island's natural resources and advance public health and equity in our state. ECRI objects to 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 urge the EFSB to proceed with a full application and review of the proposed alteration.

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). In our comments, we will outline why these alterations are significant and why they may result in a significant impact on the environment and public health, thus warranting review by the EFSB.

The proposed expansion of the facility includes 6 new 90,000-gallon tanks with the required complete hook ups for Liquid Propane Gas (LPG) entering the facility by rail, as well as all new loading zones for trucks. It also adds a new form of transportation for the LPG—rail—whereas currently the facility is only set up to process LPG arriving from marine vessels. The proposed expansion will occur on a vacant adjacent lot, which means that Sea 3 is proposing an expansion of its footprint in Providence. For context, a single 90,000-gallon tank can be over 130 feet in length, thus far larger than many residential buildings in the area. The added loading

zones and rail capacity will take up even more space. In terms of sheer volume and alterations to the current operation, what Sea 3 has proposed is significant.

Any expansion of LPG, in particular in the already overburdened community of the Port of Providence, poses significant risks to the environment and public health. The proposed construction is being sited in an environmental justice zone and in a community that is majority Black, Brown, Indigenous, and People of Color (BIPOC). The neighborhood already overburdened by myriad sources of pollution and dust with very high asthma rates, with asthma accounting for 13.7% of children emergency room visits per every 1,000, according to data from the RI Department of Health. LPG is a fossil fuel with ties to local air pollution as well as the global climate crisis. Further, adding additional rail traffic into the neighborhood will increase local particulate matter, which is the main toxin driving high rates of asthma in this community.

Because of the projects location in an environmental justice zone, review of the proposed alteration should have extended comment periods and require outreach in the local community. In addition, the review of the alteration should include cumulative health and safety impacts. To accurately determine the impacts of expansion to this facility, the compounding effects of co-pollutants on health and safety must be considered.

The expansion of fossil fuel-based rail transit and LPG processing is inconsistent with the City of Providence Climate Justice Plan which has the target of reducing asthma rates and emissions in Providence. Expansion of such fossil fuel infrastructure may also be inconsistent with Rhode Island's mandatory and enforceable goals of reducing our reliance on fossil fuels, which goals were made statutory in the Act On Climate, signed into law last month.

The expansion of Sea3 is indeed a major alteration, and we urge you to determine it as such and proceed with a full review process that considers the needs of the community in this environmental justice zone.

Thank you,

Greg Gerritt

Administrator
Environmental Council of Rhode Island