



CITY OF PROVIDENCE
Jorge O. Elorza, Mayor

June 7, 2021

Hon. Raymond A. Hull
Chair, House Municipal Government and Housing Committee
Rhode Island State House
82 Smith Street
Providence, RI 02903

Re: House Bill 6383

Chair Hull and Members of the House Municipal Government and Housing Committee,

As the Director of Sustainability for the City of Providence, I am writing to express my support for H6383- An Act Relating to State Affairs and Government -- Environmental Justice Act, and to offer a few minor comments on the specifics of the bill. This legislation is a critical step towards addressing the state's environmental justice issues and protecting these communities from further harm from polluting industries.

In Rhode Island and around the world, low-income communities of color bear a disproportionate burden from pollution. Regulators must be able to consider the cumulative impacts of the existing and proposed development when evaluating new proposals, especially in already overburdened communities. This strategy is referenced several times in Providence's Climate Justice Plan. While the Act on Climate legislation was an important step to reducing greenhouse gas emissions statewide, it does not prioritize emission reduction in areas that are most burdened by pollution, nor does it protect these communities from non-greenhouse gas related pollution or other negative impacts. The Climate Justice Plan states that, "The law should also incorporate cumulative impact analysis into emissions standards for air and climate pollution, requiring consideration of cumulative levels and effects of past and current pollution before permits may be issued for facilities" (see page 54 of the Climate Justice Plan).

The Office of Sustainability worked with environmental justice leaders from across the city for more than two years to create the Climate Justice Plan. These community leaders thoughtfully used data and their own lived experience and knowledge of community to define Providence's Frontline Communities, or those communities who are most impacted by the crises of ecology, economy, and democracy. In Providence, they generally include the Indigenous, African American, Black, Latinx, and Southeast Asian communities. There is particular emphasis on people of color who are refugees and immigrants, people with criminal records, those who speak languages other than English, and LGBTQIA+ individuals. The EPA's Environmental Justice Screening and Mapping Tool (EJSCREEN) was a useful tool for identifying frontline communities. For Providence, EJSCREEN identifies parts of South Providence, Washington Park, Olneyville, Manton, Silver Lake, Wanskuck, and the West End as frontline communities. **I recommend this legislation require RIDEM to work with frontline community members from across the state to help identify which areas should be designated as Environmental Justice focus areas.**



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I also suggest considering more democratic ways for community to be represented in the process. Perhaps representation could include one person appointed by the governing body of the municipality and one community member appointed by residents. Specific qualifications and term limits should be considered, as well as other measures to ensure these individuals are in fact accountable to the community they are serving. The community representative should also have a role in helping determine the location and date/time of the Public Hearing as to ensure it is accessible and convenient to residents. They should also be compensated for the time and energy put into this process. It is important that this process not create additional hardship or burden for these communities and that they have the resources to participate thereby ensuring it is not extractive.

I am pleased to see this legislation being introduced and I appreciate your time and consideration on this important issue. Please feel free to contact me with any questions you may have.

Respectfully submitted,

Leah Bamberger

Director of Sustainability, City of Providence

OFFICE OF SUSTAINABILITY

25 Dorrance St Suite 501B, Providence, Rhode Island 02903

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