
#1

PAGE 1

Q1: First Name (optional)

Respondent skipped this question

Q2: Last Name (optional)

Respondent skipped this question

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

Comments 310 CMR 7.74

1. 310 CMR 7.74(7)(b)3: this provision references 40 CFR 98.5(h), but I believe 40 CFR 98.5 only has subsections (a) and (b)
 2. 310 CMR 7.74(7)(a)2.and 310 CMR 7.74(7)(b)3. It might be helpful in these 2 provisions to clarify that only GHG emissions for Part 98 Subpart D Units need to be reported under 310 CMR 7.74(7). Many electrical generating facilities subject to 310 CMR 7.74 also house smaller emission units that report under Part 98 Subpart C, and emissions from these non-Subpart D Units should not count against 7.74 GHG emission Limits
 3. 310 CMR 7.74(8): there appears to be an inconsistency in this recordkeeping provision, as it first requires all recordkeeping to be kept on site for “ a period of three years from the date the record is created”, but then says this period may be extended any time “before the end of the five years”.
 4. 7.74 Definition: Greenhouse Gas (GHG): this definition is expansive beyond the usage in Part 98. To avoid confusion, since 310 CMR 7.74 is built on GHG emissions reported in Part 98, it is suggested the definition of GHG emissions in 310 CMR 7.74 be restricted to its definition in Part 98
-

#2

PAGE 1

Q1: First Name (optional)

Janot

Q2: Last Name (optional)

Mendler de Suarez

Q3: Company or Organization - if applicable (optional)

BU Pardee Center for the Study of the Longer-Range Future

Q7: Please type your comment below.

Could we consider restructuring vehicular excise tax to incentivize fuel-efficiency? A new graduated excise tax emissions reduction incentive could be based on manufacturers' stated model year MPG, or efficiency standards could be introduced as a discounting factor using the current system based on vehicle value by model year. A structured statewide emissions-reducing MPG-based excise tax rate could be introduced with a relatively short phase-in period. It could be revenue neutral w/respect to overall current volume of excise income collected, although likely to be more effective if progressive with a higher rate threshold under which the tax rate per MPG would auger up by an increment each year, increasing the relative cost for high-emitting vehicles over time.

#3

PAGE 1

Q1: First Name (optional)

Lillia

Q2: Last Name (optional)

Frantin

Q3: Company or Organization - if applicable (optional)

PLAC

Q7: Please type your comment below.

Nuclear energy is a dead & antiquated, inefficient AND DANGEROUS power source. Not only does it contribute to global warming during its processing for fuel, requires (DANGEROUS!!!) transportation and massive (LONG-TERM!!!) CONSTRUCTION costs adding to further pollution, BUT PERHAPS MOST DEADLY OF ALL- it PRODUCES HIGHLY RADIOACTIVE WASTE WITH NO PLACE TO SAFELY STORE (there is no way of getting RID of it!!) ...FOR THOUSANDS OF YEARS.in HIGHLY POPULATED AREAS!!! SURROUNDED BY HOMES, SCHOOLS AND NATURAL RESOURCES ALL OF WHICH ARE IRREPLACEABLE!!!!< THIS IS INSANE! We have clean, green, job-PRODUCING renewable energy sources & conservation efficiencies NOW AVAILABLE> DEP!!! DO YOUR JOB!!! STOP PROTECTING PROFITS & PROTECT PEOPLE & PLANET!!!

#4

PAGE 1

Q1: First Name (optional)

Amy

Q2: Last Name (optional)

Swanson

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

Keep on track for reducing emissions! 2 aspects that I am especially interested in the government supporting are:

1) continued support to keep alternative energy (solar, wind) at a cost that makes it affordable for us to adopt more broadly and more quickly.

2) Insist that utilities fix the gas leaks. It is unconscionable that these leaks be allowed to continue since they release so much CO2 and methane into the atmosphere. Additionally, as a ratepayer, I am paying for all that.

#5

PAGE 1

Q1: First Name (optional)

Juan

Q2: Last Name (optional)

Stella

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

I like the concept of the plan, but the devil is in the details. As such, you probably know that carbon capture is a gimmick. Most of the captured carbon is sent right back into fossil fuel extraction. That is not helpful!

Never mind it is very expensive; in 2005 MIT did a study showing a 61-74% premium for carbon capture. I don't want subsidies for utility companies to continue to burn fossil fuels. Utility-scale solar costs about the same or less per kWh.

There are plants up and running, or close to it, in Illinois Industrial Carbon Capture and Storage project in Decatur, Ill., Kemper Integrated Gasification Combined Cycle plant in Kemper County, Miss.; Texas Clean Energy Project in Penwell, Texas; Hydrogen Energy California Project in Bakersfield, Calif.; and the FutureGen 2.0 project in Meredosia, Ill. They are not doing well when it comes to costs and the ideal end state of the captured carbon. Let's not make the same mistake here.

We need green energy from renewable sources coupled with storage. We don't need carbon capture to achieve our targets.

#6

PAGE 1

Q1: First Name (optional)

Terrence J.

Q2: Last Name (optional)

Gibbons

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

I speak for my family, which includes 9 grandchildren, from age 9 years to 3 months old. We oppose the siting of the proposed Spectra gas compressor in Weymouth. At the very least, one such station, if allowed, should be located far from a densely populated area. The safety record of Spectra is far from assuring. There are many reports of explosions and other mishaps at their properties. Any such event in our Fore River estuary will be disastrous. The population density of this area should be of prime consideration, and reason enough to deny any permit to Spectra. In addition, there are fuels already stored at the Fore River location.

The evacuation of people from any emergency is severely limited by the bridge which links Weymouth and Quincy neighborhoods. Route 3A is the main artery road that would be traveled, and it is directly beside the proposed plant. The likely scenario of the bridge impairment by an explosion would result in autos attempting to exit via several side street areas, clearly not in the interest of safety.

The periodic "blow downs", will release directly to the atmosphere many gasses, again an environmental insult. The wind patterns will disperse these effluents over a wide area which is heavily populated.

In sum, the public health and safety is greatly at risk in Spectra's proposal and we are on record in opposing it.

#7

PAGE 1

Q1: First Name (optional)

John

Q2: Last Name (optional)

Nichols

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

Energy-generating plants built prior to Dec 31, 2010 should not be included in the DEP Clean Energy Standard (CES) because they are not as clean as more recent and future technologies, but can continue to produce relatively dirty energy and sell their CES credits to polluting energy plants, thus perpetuating the production of dirty energy by the buyer, and allowing the originating less-clean plant to continue in operation.

In selecting that cut-off date. DEP recognized that awarding CES credits to old plants would not encourage the construction of new clean energy plants. but would result in CES-credit-selling and windfall profits to the seller, without lessening emissions. (DEP Background Document on Proposed New and Amended Regulations, December 16, 2016, p. 29)

In addition, referring to nuclear energy in particular, a 2008 analysis of more than 100 studies of nuclear power’s carbon footprint by Virginia Tech and University of Singapore professor Benjamin Sovacool concluded that nuclear plants in their life-cycle emit about six times the carbon emissions of wind power, and 2-3 times the carbon emissions of various types of solar power technologies. (“Valuing the greenhouse gas emissions from nuclear power: A critical survey,” Benjamin Sovacool, University of Singapore and Virginia Tech University, Energy Policy 36, June 2008., reported by Briefing Paper NUCLEAR ENERGY IS DIRTY ENERGY, Michael Mariotte, Nuclear Information and Resource Service [NIRS], updated July 2014, p. 4. <https://www.nirs.org/wp-content/uploads/factsheets/nuclearenergyisdirtyenergy2014.pdf>)

#8

PAGE 1

Q1: First Name (optional)	Andrea
Q2: Last Name (optional)	Honore
Q3: Company or Organization - if applicable (optional)	none

Q7: Please type your comment below.

Hi MassDEP,

Please enact and enforce new regulations that impose a limit on greenhouse gas emissions that may be released in MA; limit the aggregate emissions released from each group of regulated sources or categories of sources; set emission limits for each year and set limits that decline on an annual basis. FERC’s recent conditional approval of the Weymouth gas compressor proposal goes in direct opposition to meeting MA’s climate goals. ANY new natural gas infrastructure is incompatible with meeting climate goals set by Massachusetts’ 2008 Global Warming Solutions Act, and MA does not need additional gas infrastructure.

Thank you for you time and attention in this matter,
Andrea Honore
617-276-5564

#9

PAGE 1

Q1: First Name (optional)

Nickolas

Q2: Last Name (optional)

Faynshteyn

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

MassDEP, please enact and enforce new regulations that impose a limit on greenhouse gas emissions that may be released in MA; limit the aggregate emissions released from each group of regulated sources or categories of sources; set emission limits for each year and set limits that decline on an annual basis. FERC's recent conditional approval of the Weymouth gas compressor proposal goes in direct opposition to meeting MA's climate goals. ANY new natural gas infrastructure is incompatible with meeting climate goals set by Massachusetts' 2008 Global Warming Solutions Act, and MA does not need additional gas infrastructure.

Thank you for you time and attention in this matter.

#10

PAGE 1

Q1: First Name (optional)

Respondent skipped this question

Q2: Last Name (optional)

Respondent skipped this question

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

MassDEP, please enact and enforce new regulations that impose a limit on greenhouse gas emissions that may be released in MA; limit the aggregate emissions released from each group of regulated sources or categories of sources; set emission limits for each year and set limits that decline on an annual basis. FERC's recent conditional approval of the Weymouth gas compressor proposal goes in direct opposition to meeting MA's climate goals. ANY new natural gas infrastructure is incompatible with meeting climate goals set by Massachusetts' 2008 Global Warming Solutions Act, and MA does not need additional gas infrastructure.

We don't need or want the additional gas infrastructure. Please let our money be better spent towards renewables which are better for the environment, help to meet our emission goals, and will give more jobs to people living in our state. Please protect our environment.

Thank you,
Linda Illes

#11

PAGE 1

Q1: First Name (optional)

Scott

Q2: Last Name (optional)

Domenici

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

MassDEP, please enact and enforce new regulations that impose a limit on greenhouse gas emissions that may be released in MA; limit the aggregate emissions released from each group of regulated sources or categories of sources; set emission limits for each year and set limits that decline on an annual basis. FERC's recent conditional approval of the Weymouth gas compressor proposal goes in direct opposition to meeting MA's climate goals. ANY new natural gas infrastructure is incompatible with meeting climate goals set by Massachusetts' 2008 Global Warming Solutions Act, and MA does not need additional gas infrastructure. Thank you for you time and attention in this matter.

#12

PAGE 1

Q1: First Name (optional)

Wendy

Q2: Last Name (optional)

Graca

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

Dear MassDEP,

I am writing to ask you to please enact and enforce new regulations that impose a limit on greenhouse gas emissions that may be released in MA. The aggregate emissions released from each group of regulated sources or categories of sources need to be limited. Emission limitations should be set for each year and as well as limits that decline on an annual basis. FERC's recent conditional approval of the Weymouth gas compressor proposal goes in direct opposition to meeting MA's climate goals. ANY new natural gas infrastructure is incompatible with meeting climate goals set by Massachusetts' 2008 Global Warming Solutions Act, and MA does not need additional gas infrastructure.

Thank you for you time and attention in this matter.

#13

PAGE 1

Q1: First Name (optional)

Kori

Q2: Last Name (optional)

Feener

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

MassDEP, please enact and enforce new regulations that impose a limit on greenhouse gas emissions that may be released in MA; limit the aggregate emissions released from each group of regulated sources or categories of sources; set emission limits for each year and set limits that decline on an annual basis. FERC's recent conditional approval of the Weymouth gas compressor proposal goes in direct opposition to meeting MA's climate goals. ANY new natural gas infrastructure is incompatible with meeting climate goals set by Massachusetts' 2008 Global Warming Solutions Act, and MA does not need additional gas infrastructure.

Thank you for you time and attention in this matter.

#14

PAGE 1

Q1: First Name (optional)

Respondent skipped this question

Q2: Last Name (optional)

Respondent skipped this question

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

Consumers for Sensible Energy writes:

"February 7, 2017 – The costs of the proposed Access Northeast pipeline to transport fracked gas into Massachusetts and other New England states would be more than double what pipeline sponsors claim -- \$6.6 billion versus the projected \$3.2 billion – according to a dramatic new report by Synapse Energy Economics.

Furthermore, the report projects that the use of natural gas in New England for electric generation will decrease by 27% by 2023, compared to 2015, leaving the pipelines underused and unneeded.

The report was sponsored by a coalition of environmental groups, including the Sierra Club of Massachusetts, Consumers for Sensible Energy, Pipeline Awareness Network of the Northeast, Mass Energy Consumers Alliance, Connecticut Fund for the Environment and the Sierra Club of Connecticut.

Rather than reduce consumers' bills, as claimed by the pipeline sponsors, the pipeline would increase costs for Massachusetts consumers by \$141 million over the life of the pipeline, according the Synapse report."

These words explain much better than I could how I feel about this pipeline and compressor station proposed for Weymouth. It is a dying industry. Why would we want to invest that kind of money when the infrastructure keeps us from meeting our own emission reduction goals. Renewables will help us. Please protect our environment.

Linda Illes

#15

PAGE 1

Q1: First Name (optional)

Respondent skipped this question

Q2: Last Name (optional) Higgins

Q3: Company or Organization - if applicable (optional) citizen

Q7: Please type your comment below.

MassDEP, please enact and enforce new regulations that impose a limit on greenhouse gas emissions that may be released in MA; limit the aggregate emissions released from each group of regulated sources or categories of sources; set emission limits for each year and set limits that decline on an annual basis. ANY new natural gas infrastructure is incompatible with meeting climate goals set by Massachusetts' 2008 Global Warming Solutions Act.

Thank you for you time and attention in this matter.

#16

PAGE 1

Q1: First Name (optional) Don

Q2: Last Name (optional) Ogden

Q3: Company or Organization - if applicable (optional) The Enviro Show

Q7: Please type your comment below.

We recommend the Massachusetts DEP move to ban logging on public lands so that existing trees can sequester as much CO2 as possible while ending CO2 emissions from logging and harmful forestry practices.

#17

PAGE 1

Q1: First Name (optional) Linda

Q2: Last Name (optional) Haley

Q3: Company or Organization - if applicable (optional) *Respondent skipped this question*

Q7: Please type your comment below.

Dear regulators,

Any new or expanded infrastructure, specifically methane emitting "natural" gas will preclude the Commonwealth from meeting the GWSA goals. Please protect us, the citizens of Mass, by not allowing any projects in progress or planned, including the gas plant in Salem, the metering station in W. Roxbury & the Weymouth compressor station to be allowed to not only destroy our climate, but needlessly endanger the health & safety of the host communities. Do not protect the profits of gas companies, most of which are from out of our state or nation, that will export gas at our expense-financial & otherwise. Thank you for your careful consideration.

#18

PAGE 1

Q1: First Name (optional)

Christine

Q2: Last Name (optional)

Lazar

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

MassDEP, please enact and enforce new regulations that impose a limit on greenhouse gas emissions that may be released in MA; limit the aggregate emissions released from each group of regulated sources or categories of sources; set emission limits for each year and set limits that decline on an annual basis. FERC's recent conditional approval of the Weymouth gas compressor proposal goes in direct opposition to meeting MA's climate goals. ANY new natural gas infrastructure is incompatible with meeting climate goals set by Massachusetts' 2008 Global Warming Solutions Act, and MA does not need additional gas infrastructure. Thank you for your time and attention in this matter

#19

PAGE 1

Q1: First Name (optional)

Respondent skipped this question

Q2: Last Name (optional)

Respondent skipped this question

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

The West Roxbury Lateral Pipeline is EXTREMELY dangerous!!! The proximity to public schools and under playing fields is appalling. The company behind it has been sited for numerous safety violations. As a Dedham resident I am gravely concerned for the safety of my community and family.

Please conduct safety testing and inspections!!! And inform public safety (fire department, etc...) what to do in case of an emergency.

Thank you!

#20

PAGE 1

Q1: First Name (optional)

Respondent skipped this question

Q2: Last Name (optional)

Respondent skipped this question

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

MassDEP, please enact and enforce new regulations that impose a limit on greenhouse gas emissions that may be released in MA; limit the aggregate emissions released from each group of regulated sources or categories of sources; set emission limits for each year and set limits that decline on an annual basis. ANY new natural gas infrastructure is incompatible with meeting climate goals set by Massachusetts' 2008 Global Warming Solutions Act.

Thank you for your time and attention in this matter.

#21

PAGE 1

Q1: First Name (optional)	Tracy
Q2: Last Name (optional)	Manzella
Q3: Company or Organization - if applicable (optional)	CARCS

Q7: Please type your comment below.

I cannot fathom how the MA DEP could possibly sit back and allow these pipeline infrastructure projects get approved. MA is a progressive state with progressive goals toward reducing our GHG emissions. With the additional gas moving through our mostly antiquated pipes which are leaking we will never be able to stay on target. Spectra Energy is literally using us as a state and as consumers to get their fracked gas through us to Canada for export. I don't know how any one can justify Atlantic Bridge, ANE or AIM as there is clearly no need for more gas reserves. It does not take a rocket scientist to see companies like Spectra have over-produced and are extremely motivated to get their product overseas where there will be more demand which will drive the price of gas sky high. What we NEED in this state is to reduce or GHG emissions which will never happen unless we force these companies to address the the leaking infrastructure- leaks that we pay for. The DEP needs to hold their feet to the fire and get the leaks fixed! How can anyone suggest we have a "need" before taking this step. Capture the ost reserves and there is the additional gas reserves we could use if needed. If a homeowner has a leaking water pipe, they fix the leak. This is only makes good practical common sense. More gas reserves, less GHG emissions and a safer public. What we need is diversification, not a over reliance on a single fossil fuel. This will spell disaster for us as consumers and our state. We need to live up to our progressive goals, and not allow these greedy pipeline companies do to us what they have successfully done to those like us everywhere else. Do your job MA DEP. Do the RIGHT thing. STOP SPECTRA ENERGY and represent and protect the people you are supposed to.

#22

PAGE 1

Q1: First Name (optional)	marie
Q2: Last Name (optional)	shaw
Q3: Company or Organization - if applicable (optional)	<i>Respondent skipped this question</i>

Q7: Please type your comment below.

I am writing with concern that the State of Massachusetts continue their efforts to reduce greenhouse gasses as they contribute to the current climate change. I feel it is in the best interest of all of the citizens of Massachusetts that the agencies in this state work diligently to create renewable energy that will reduce the use of fossil fuel dependency.

In that effort, there is a current situation on the south shore of Massachusetts that demands the DEP stop the efforts of the Federal Government to increase the use and distribution of fossil fuels through our state. The current Atlantic Bridge Project by FERC has been given a conditional approval. The approval of this project by the DEP would increase the use of and distribution of (throughout the world, as our state is being used as a weigh station), natural gas that would thereby impact the greenhouse gas levels and climate increases in the world.

The only thing that stands in the way of this Atlantic Bridge going forward is the DEP. Not allowing it to happen would allow the state to find alternative renewable options to produce energies for our state. The Atlantic Bridge project completely goes against your efforts to reduce greenhouse gasses and promote renewable energies, so their petition should be rejected. A solar farm or windmill would be much more appropriate at the mouth of the Fore River in Weymouth than a smelly, loud, poisonous and dangerous compressor station, that will benefit only the company who is building it.

I applaud the efforts of the DEP to look at implementing renewable energies, but your efforts must begin with stopping the biggest fossil fuel initiative in this state: The Atlantic Bridge Project.

Thank you for your time,
Marie Shaw

#23

PAGE 1

Q1: First Name (optional)

Paul

Q2: Last Name (optional)

Lauenstein

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

The impending hiatus in state support for residential and community solar projects is unconscionable in view of the urgent need to reduce carbon emissions, and arguably illegal, given the Global Warming Solutions Act requirement to reduce carbon emissions by a whopping 80% by 2050.

Cutting support for the solar industry in Massachusetts is penny-wise and pound-foolish. Boston, the economic hub of New England, is a low-lying coastal city that is vulnerable to sea level rise. In the long run, no sea wall can protect Boston without a concomitant, drastic reduction in greenhouse gas emissions.

Also, the solar industry has been the fastest-growing sector of the energy industry in Massachusetts, and currently employs at least 18,000 people (see: <http://solarindustrymag.com/massachusetts-surpasses-100000-clean-energy-jobs>). However, that number could shrink with an interruption in state support.

The Governor, the state legislature, EOEAA and DEP should work together to expedite renewal of support for the solar industry, and maintain Massachusetts' leadership in transitioning to a clean-energy economy.

#24

PAGE 1

Q1: First Name (optional)

Cindy

Q2: Last Name (optional)

Respondent skipped this question

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

Please limit the aggregate emissions released from each group of regulated sources or categories of sources; set emission limits for each year and set limits that decline on an annual basis. This needs to be mandated as it stands in State Law. Please lower the gas emissions by stopping projects that will add to the emissions. Gas Compressor Stations.

Thank you,

#25

PAGE 1

Q1: First Name (optional)

Kimberlee

Q2: Last Name (optional)

Flike

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

I would like to voice my support for the regulations to reduce greenhouse gases. It is our duty to protect the environment and prevent the construction of the proposed natural gas compressor station in north weymouth. Thank you.

#26

PAGE 1

Q1: First Name (optional)

Jennifer

Q2: Last Name (optional)

Edwards

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

MassDEP, please enact and enforce new regulations that impose a limit on greenhouse gas emissions that may be released in MA; limit the aggregate emissions released from each group of regulated sources or categories of sources; set emission limits for each year and set limits that decline on an annual basis. ANY new natural gas infrastructure is incompatible with meeting climate goals set by Massachusetts' 2008 Global Warming Solutions Act.

#27

PAGE 1

Q1: First Name (optional)

Rachel

Q2: Last Name (optional)

Medeiros

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

Please do the following for our state, and our future generations ????

1. Support major annual reductions in greenhouse gases produced by our energy infrastructure, specifically: carbon, sulfur hexafluoride, and methane.
2. Enact transportation regulations to decrease pollution from state-owned vehicles.
3. Generously increase the Renewable Portfolio Standard each year, so utility companies have to provide ratepayers with a higher percentage of energy from renewable sources.

Many thanks from myself and my friends and family who feel the same way.

Rachel Medeiros,
New Bedford

#28

PAGE 1

Q1: First Name (optional)

Irene

Q2: Last Name (optional)

Paine

Q3: Company or Organization - if applicable (optional)

Pilgrim Legislative Advisory Coalition member

Q7: Please type your comment below.

Dear Massachusetts DEP:

We citizens of Massachusetts really are trying hard to reach our carbon reduction goals in order to slow the effects of climate change. And while we do that by bringing into the electric grid more and more clean energy technologies from wind power to solar power to water power, we want to be very careful not to trade one huge problem for another. Nuclear power stations should never be considered as the providers of clean electric energy. The resulting radioactive spent fuel stores will be radioactive for thousands of years, longer into the future than the pyramids were built in the past. We have no proper, safe and secure way to store such dangerous results of our present quest for more and more electric power in every household, and for every industry.

Every nuclear power station in the nation is waiting for the federal government to come up with the answers on how to transport and store radioactive waste, and the answers are just not coming, resulting in each nuclear generator of power having to store their own radioactive waste. This was never meant to be the case. Our Pilgrim Nuclear Power Station out here on the shores of Cape Cod Bay was not sited to be a radioactive waste dump when it was originally licensed. But that is exactly what it has become. The station, rated one of the worst in the nation, has been closed down many times since the beginning of this year for safety reasons and repairs. During those times when electricity was not being generated, we all survived. There were no brown outs during the summer of 2016, a season when we use the most electricity. If all of us cut back ten percent on the power we use, the contribution of Pilgrim is not even necessary at all. Entergy should just close up now, and go back to Louisiana, in my opinion. The jobs in Plymouth are not worth the extreme risk to Plymouth and far beyond. How horrible that America's hometown, almost 400 years old now, is host to such a dangerous corporate facility.

At the same time, Eversource is making proposals for a smart grid down here on Cape Cod, I believe that the proposed smart grid should give consumers the option to choose less expensive power usage in the evening, and to run their dishwashers and electric dryers at night, thus saving on daytime use and consumption of power. I remember my grandparents being electrically frugal in this way. Sounds like I'm changing the subject, but it's all related to the great American appetite for power. We can go on a diet, as other countries have. And we can choose truly renewable and green power sources as we go forward. My final plea: let us do the moral thing and get nuclear power totally out of the mix before catastrophic events occur, causing relocation (not just evacuation) of a great segment of the Massachusetts population (and businesses) to other areas and states. Many catastrophes in this world- hurricanes, floods, earthquakes- are caused by mother nature, and are beyond immediate human control. But the shuttering of a nuclear power station, and the safe storage in the most secure methods we presently have to use. . . this is totally in human hands, and thus catastrophic nuclear accidents can be prevented. Let's not even think of including nuclear powered electricity into our future plans. MORE subsidized solar and wind power! These technologies are truly sustainable and truly clean.

Thank you for working on these important regulations and for giving us an opportunity to comment. Irene M. Paine
24 Gooseneck Road, Yarmouth Port, MA 02675 (30 miles from Pilgrim across Cape Cod Bay).

#24
21

#29

PAGE 1

Q1: First Name (optional)

Myles

Q2: Last Name (optional)

Lamson

Q3: Company or Organization - if applicable (optional)

ML3 Consulting

Q7: Please type your comment below.

I'd like to put some clean nuclear waste in the basement of Entergy's main office.

#30

PAGE 1

Q1: First Name (optional)

Myles

Q2: Last Name (optional)

Lamson

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

How do I get the results of that survey I just filled out??

#31

PAGE 1

Q1: First Name (optional)

Alexandra

Q2: Last Name (optional)

Grabbe

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

Nuclear energy is NOT clean energy, it never has been and never will be. DO NOT change the regulations to allow nuclear to qualify for Clean Energy Credit

#32

PAGE 1

Q1: First Name (optional)

Respondent skipped this question

Q2: Last Name (optional)

Respondent skipped this question

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

COMMENTS:

Dear Mass DEP: please enact and enforce

new regulations that impose a limit on greenhouse gas emissions that may be released in

MA; limit the aggregate emissions released from each group of regulated sources or

categories of sources; set emission limits for each year and set limits that decline on an

annual basis. ANY new natural gas infrastructure is incompatible with meeting climate

goals set by the Massachusetts' 2008 Global Warming Solutions Act. Thank you, Louisa F-S

#33

PAGE 1

Q1: First Name (optional)

A.

Q2: Last Name (optional)

Rosenkranz

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

Nuclear energy is NOT clean energy, it never has been and never will be. The mining of uranium and its transport must be factored in as part of nuclear energy and they contribute a lot of greenhouse gas emissions. Additionally, and importantly, deadly, toxic nuclear waste will be with future generations for eons and its disposal and storage has not been solved since the inception of nuclear power. DO NOT change the regulations to allow nuclear to qualify for Clean Energy Credits. On the contrary, it is dirty and deadly energy.

#34

PAGE 1

Q1: First Name (optional)

Natasha

Q2: Last Name (optional)

Eilbert

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

Glad to see this plan put forth, thank you for your work on it. My only complaint is that I would like to see our state do even more to help protect ourselves and others against the grave threat of climate change effects.

#35

PAGE 1

Q1: First Name (optional)

nan

Q2: Last Name (optional)

logan

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

I am thrilled to be invited to advocate for renewable energy sources in Massachusetts. While I believe that market forces will help move us in that direction I support any state efforts to increase the use of wind and solar. It would be lovely to have tidal as well!

#36

PAGE 1

Q1: First Name (optional)

Kathryn

Q2: Last Name (optional)

Archard

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

Commissioner Suuberg of the Department of Environmental Protection,

Please support the following initiatives:

1. Major annual reductions in greenhouse gases produced by our energy infrastructure, specifically: carbon, sulfur hexafluoride, and methane.
2. Enact transportation regulations to decrease pollution from state-owned vehicles.
3. Generously increase the percentage of renewable energy that the utilities have purchase each year (the Renewable Portfolio Standard).
4. Stop putting fossil fuel power plants in low income communities of color such as Brockton. Do not extend the Brockton Power EFSB site permit.

Thanks,
Kathryn Archard

#37

PAGE 1

Q1: First Name (optional)	Kevin
Q2: Last Name (optional)	Kelly
Q3: Company or Organization - if applicable (optional)	Groton Electric Light Department

Q7: Please type your comment below.

Massachusetts Department of Environmental Protection (DEP)
Proposed Regulation on Power Plant Emissions (DEP 310 CMR 7.74)
Comments of the Groton Electric Light Department
February 22, 2017

The Groton Electric Light Department (GELD), a Massachusetts Municipal Lighting Plant (MLP) created under Massachusetts law, appreciates the opportunity to offer comments on regulations proposed by the Massachusetts Department of Environmental Protection (DEP) on power plant emissions.

GELD is one of 25 Massachusetts municipal utility Project Participants in the Stony Brook power plant, a 527-megawatt dual-fueled power plant located in Ludlow. Stony Brook is principally owned and operated by the Massachusetts Municipal Wholesale Electric Company (MMWEC). As a Stony Brook Project Participant, GELD pays its proportionate share of Project costs and receives a share of the Project output to meet its customers' electric requirements. Stony Brook would be subject to these proposed regulations, which by extension would affect customers of GELD.

GELD has several concerns related to the proposed power plant emissions regulations, which could result in higher rates for our customers and lesson reliability at the same time.

First, the emissions cap called for in these proposed regulations will impose significant operating restrictions on Massachusetts generating facilities, including Stony Brook. The 2018 GHG emissions cap proposed for Stony Brook is extremely aggressive at 52.4% lower than the average annual GHG emissions released from Stony Brook during the years 2013, 2014 and 2015. Additionally, the GHG emissions during the years 2013, 2014 and 2015 were approximately 75% lower than the Stony Brook emissions that were released during the GWSA reference year of 1990. This results in a proposed 2018 GHG emissions cap that is approximately 88% lower than the emissions that were released from Stony Brook in 1990. The proposed 2050 Stony Brook cap is more than 99% lower. When considering the Stony Brook GHG emissions reductions, this extremely aggressive proposal far exceeds the GWSA goals. Its implementation will result in a severe constraint on the ability to operate the plant resulting in system reliability issues, excessive costs and an exposure to non-compliance.

Many facilities will reach their emissions cap before the end of the calendar year, resulting in a need to purchase over-compliance credits, if they are available, from another facility in order to continue operating. Significantly, the proposed regulation does not have a provision for an Alternative Compliance Payment (ACP) in the event over-compliance credits are not available. Facilities that reach their cap and are not able to purchase credits or pay an ACP will be forced to cease operation in the latter part of the calendar year. This is typically the start of the winter peak period and could pose significant reliability issues for ISO-New England, resulting in a wide range of hardship for consumers throughout New England, including increased costs for customers of GELD. Massachusetts generators also would face significant financial penalties from ISO New England due to their inability to meet their power supply commitments. Going forward, this problem will become more pronounced as the greenhouse gas cap is lowered each year, resulting in reliability issues for the New England bulk power system.

Second, the regulation will cause an increase in the cost of electricity for GELD customers and consumers throughout New England. This will happen as Massachusetts generators increase their dispatch costs to cover the costs of compliance. Costs also will increase due to curtailed operation of the Massachusetts fleet, which will be replaced by higher-cost, out-of-state generating units. Massachusetts units will be displaced due to the unavailability of compliance credits as emissions limits ratchet down.

Third, because the Massachusetts fleet generally has lower emissions levels than generating units in other states, the result will be higher emissions for the New England region, frustrating the purpose of the proposed regulation.

Fourth, the transportation sector is the largest emitter of greenhouse gas emissions in Massachusetts, yet this proposed regulation requires the electricity sector to assume most of the burden associated with reducing greenhouse gas emissions. GELD believes there should be better balance and proportionate application of regulations to the

various emission-producing sectors.

Most of these concerns stem from the fact that Massachusetts is part of an integrated, regional wholesale power marketplace where energy resources are shared across state lines and the rules of the marketplace are focused on ensuring reliability on a regional basis. In such an environment, Massachusetts cannot act in isolation to regulate power plant emissions without affecting reliability, prices and emissions levels for the entire region.

The Regional Greenhouse Gas Initiative (RGGI) is an example of a much broader based, regional initiative to limit power plant emissions. RGGI works due in part to the RGGI market for allowances being much larger and liquid than the very limited and finite market for allowances proposed under the Massachusetts regulation. GELD and other Stony Brook project participant municipal utilities have invested millions of dollars in plant equipment, operating and monitoring systems to ensure compliance with Massachusetts emissions standards. In addition, Project Participants have purchased \$2.9 million in CO2 emissions allowances under the RGGI program in support of that regional emissions reduction initiative.

GELD understands and appreciates the DEP’s regulatory initiatives in light of mandates associated with GWSA compliance but encourages the DEP to fully consider the regional implications of its proposed regulations as this review process continues.

GELD appreciates this opportunity to provide comment on and present our concerns regarding the proposed regulation 310 CMR 7.74.

#38

PAGE 1

Q1: First Name (optional)

Carol

Q2: Last Name (optional)

Kolek

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

It is urgent that the proposed regulations be adopted and followed through. Just because we have a White House that is turning its back on protecting us from climate change, our state legislators are not off the hook. They need to act responsibly and in the interest of all of our children and grandchildren, not in the interest of a few who are looking at their profit margin.

#39

PAGE 1

Q1: First Name (optional)

Suzanna

Q2: Last Name (optional)

Trimble

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

I would like to see a major reduction in greenhouse gases. I would like to see transportation regulations enacted to decrease pollution for state owned vehicles and I would like to see an increase of renewable energy that utilities have purchase each year.

#40

PAGE 1

Q1: First Name (optional)

Raffi

Q2: Last Name (optional)

Mardirosian

Q3: Company or Organization - if applicable (optional)

Joule Unlimited / MODO Fuels

Q7: Please type your comment below.

We appreciate the opportunity to submit comments on the Massachusetts Department of Environmental Protection's ("DEP") development of regulations to reduce greenhouse gas ("GHG") emissions under Section 3(d) of the Global Warming Solutions Act ("GWSA"). As a participant in the low carbon fuels industry, we recognize the state's policy leadership in this area with the requirement of an 80% reduction of GHG's by 2050, and the re-affirmation of this leadership as reflected by Governor Charles D. Baker's Executive Order 569

To enable the achievement of the Binding 2050 GHG Limit in the transportation sector, we recommend that DEP begin the necessary work to establish a statewide low carbon fuel standard. In particular, we recommend that DEP begin analysis of the existing low carbon fuel standard programs in California and Oregon, begin modeling the carbon intensity ("CI") of transportation fuels used in Massachusetts, and begin evaluating the optimal nature of a low carbon fuel standard designed for the Commonwealth. Both California and Oregon engaged in significant work on program design and modeling prior to requiring CI reductions under their programs.

The key benefits of a low carbon fuel standard are that it is a technology-neutral, market-based policy that does not require any significant expenditure of state funds. The pace of GHG reductions in the transportation sector can be tailored to the state's requirements, and the availability of low carbon fuels. Experience in California over the past six years has proven that a low carbon fuel standard is a uniquely effective policy mechanism that enables incremental GHG reductions across all transportation fuels and incentivizes the development and use of low carbon fuels and efficient vehicle technologies.

Thank you for your considering our input to this proceeding.

#41

PAGE 1

Q1: First Name (optional)

Alex

Q2: Last Name (optional)

P

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

Dear Mass DEP: please enact and enforce new regulations that impose a limit on greenhouse gas emissions that may be released in MA; limit the aggregate emissions released from each group of regulated sources or categories of sources; set emission limits for each year and set limits that decline on an annual basis. ANY new natural gas infrastructure is incompatible with meeting climate goals set by the Massachusetts' 2008 Global Warming Solutions Act. Thank you!

-Alex Place

#42

PAGE 1

Q1: First Name (optional)

Respondent skipped this question

Q2: Last Name (optional)

Respondent skipped this question

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

MassDEP,
please enact and enforce new regulations that impose a limit on greenhouse gas emissions that may be released in MA; limit the aggregate emissions released from each group of regulated sources or categories of sources; set emission limits for each year and set limits that decline on an annual basis. ANY new natural gas infrastructure is incompatible with meeting climate goals set by Massachusetts' 2008 Global Warming Solutions Act.

Thank you for you time and attention in this matter.

#43

PAGE 1

Q1: First Name (optional)

Geoffrey

Q2: Last Name (optional)

Holmes

Q3: Company or Organization - if applicable (optional)

Carbon Engineering

Q7: Please type your comment below.

We highly encourage the State of Massachusetts to implement a performance-based low carbon fuel standard. At Carbon Engineering, we are developing technologies to capture CO2 out of the atmosphere, and to use renewable electricity to turn it into liquid fuels like gasoline or diesel. This approach can deliver global scale quantities of fuels with ultra-low carbon intensity, but well crafted LCFS systems are critical in order to pull this technology into market.

We welcome any inquiries and discussions with policy makers working on this topic. We can be reached at the email address supplied with this form, or via our website at www.carbonengineering.com

#44

PAGE 1

Q1: First Name (optional)

Joanne

Q2: Last Name (optional)

Ivancic

Q3: Company or Organization - if applicable (optional)

Advanced Biofuels USA

Q7: Please type your comment below.

We appreciate the opportunity to submit comments on the Massachusetts Department of Environmental Protection’s (“DEP”) development of regulations to reduce greenhouse gas (“GHG”) emissions under Section 3(d) of the Global Warming Solutions Act (“GWSA”).

As a nonprofit educational organization dedicated to promoting the understanding, development and use of advanced biofuels, we know that, given current federal policy statements, substantial progress in this area requires leadership and action in the states. Massachusetts is providing this action and leadership with the requirement of an 80% reduction of greenhouse gas emissions by 2050, and the re-affirmation of this by Governor Charles D. Baker’s Executive Order 569.

To enable the achievement of the Binding 2050 GHG Limit in the transportation sector, we recommend that DEP begin the necessary work to establish a statewide low carbon fuel standard. In particular, we recommend that DEP begin analysis of the existing low carbon fuel standard programs in California and Oregon, begin modeling the carbon intensity (“CI”) of transportation fuels used in Massachusetts, and begin evaluating the optimal nature of a low carbon fuel standard designed for the Commonwealth.

Both California and Oregon engaged in significant work on program design and modeling prior to requiring CI reductions under their programs.

The key benefits of a low carbon fuel standard are that it is a technology-neutral, market-based policy that does not require any significant expenditure of state funds. The pace of GHG reductions in the transportation sector can be tailored to the state’s requirements, and the availability of low carbon fuels. Experience in California over the past six years has proven that a low carbon fuel standard is a uniquely effective policy mechanism that enables incremental GHG reductions across all ground transportation fuels and incentivizes the development and use of low carbon emissions fuels and efficient vehicle technologies.

We suggest that to promote the use of sustainable renewable fuels in air transport, that the California model be expanded to include aviation and jetfuel in any low carbon fuel program.

For more information about aviation biofuels, the online library created by Advanced Biofuels USA of more than 20,000 indexed and cataloged items may prove useful, particularly the category for aviation biofuels:
<http://advancedbiofuelsusa.info/category/aviation/>

In addition, we suggest that sources of electricity used for transportation receive the same carbon life cycle analysis scrutiny as liquid fuels. There is no reason to promote the use of fossil fuels and their attendant environmental and climate change damage to the detriment of sustainable renewable transportation energy.

#45

PAGE 1

Q1: First Name (optional)

Brett

Q2: Last Name (optional)

Hulsey

Q3: Company or Organization - if applicable (optional)

Better Environmental Solutions

Q7: Please type your comment below.

Better Environmental Solutions

Practical Solutions Today for a Better Tomorrow

February 23, 2017

Mr. Jordan Garfinkle
Environmental Analyst
Massachusetts Department of Environmental Protection
One Winter Street, 7th Floor Boston, MA 02108

RE: Reducing GHG Emissions under Section 3(d) of the Global Warming Solutions Act

Dear Mr. Garfinkle:

Thank you for your work and for considering my comments on the Massachusetts Department of Environmental Protection's ("DEP") development of regulations to reduce carbon pollution and greenhouse gas ("GHG") emissions under Section 3(d) of the Global Warming Solutions Act ("GWSA").

I am president of Better Environmental Solutions, an award-winning energy consulting firm dedicated to saving lives, jobs, and money. I work with a range of fuels makers and technologies including producers and developers of advanced biofuels, biodiesel, ethanol, renewable natural gas, waste-derived fuels, and other low carbon fuel industry participants. I have almost 40 years experience reducing carbon pollution.

I am commenting on this proposal because it will reduce carbon pollution that impacts the entire country and creates an environment in the Northeast where my clients can build advanced biofuels plants reducing carbon pollution by over 80% and create thousands of jobs.

Background

The GWSA was signed into law in August 2008 to address the challenges of climate change. As noted by the Supreme Judicial Court, the GWSA was developed:

"...against the backdrop of an emerging consensus shared by a majority of the scientific community that climate change is attributable to increased emissions, as well as perceptions in the Commonwealth that national and international efforts to reduce those emissions are inadequate."

As Governor Baker stated, the transportation sector continues to be a significant contributor to GHG emissions, and is the only sector identified in the GWSA with a volumetric increase in GHG emissions.

These air pollution reductions will also have significant direct health impacts in reducing Commonwealth residents' risk of cancer, asthma, strokes and other health problems. See my study "Highway Health Hazards" that I wrote for the Sierra Club.

The Commonwealth has determined that climate change presents a serious threat to the environment, and to the citizens, communities and economy of Massachusetts. I appreciate the state's policy leadership in this area, and Governor Charles D. Baker's reaffirming the leadership with Executive Order 569, "Establishing an Integrated Climate Change Strategy for the Commonwealth." ("EO 569") In particular, I appreciate the significance of Massachusetts' binding limit of a 25% GHG reduction below 1990 levels by 2020 ("Binding 2020 GHG Limit").

I urge DEP and the Commonwealth to recognize that the GWSA imposes not just a Binding 2020 GHG Limit but also a Binding 2050 GHG Limit. It makes sense for the State to use this rule making to promulgate regulations for short-term GHG reductions and for the long-term. As DEP is aware and as established by the official GHG inventory, the transportation sector presents the most challenging sector to the Commonwealth.

Keep Clean Air Jobs Here in the U.S.

My clients have technologies that will help solve this problem but need frameworks like the Massachusetts GWSA to promote an investment climate to fund these plants. Otherwise, US developed technology will likely be exported to other countries who are investing in carbon pollution reduction.

To achieve the Binding 2050 GHG Limit in the transportation sector, I urge DEP begin the necessary foundational work to establish a statewide low carbon fuel standard and the building blocks of a low carbon fuel standard be included in this rulemaking to facilitate long-term compliance with the GWSA.

In particular, I urge the DEP begin analysis of the existing low carbon fuel standard programs in California and Oregon, begin modeling the carbon intensity ("CI") of transportation fuels used in Massachusetts, and begin evaluating the optimal nature of a low carbon fuel standard designed for the Commonwealth. Both California and Oregon engaged in significant work on program design and modeling prior to requiring CI reductions under their programs.

The key benefits of a low carbon fuel standard are that it is a technology-neutral, market-based policy that does not require any significant expenditure of state funds. The pace of GHG reductions in the transportation sector can be tailored to the state's requirements, and the availability of low carbon fuels.

Experience in California over the past six years has proven that a low carbon fuel standard is a uniquely effective policy mechanism that enables incremental GHG reductions across all transportation fuels and incentivizes the development and use of low carbon fuels and efficient vehicle technologies. I support the specific recommendations of the Low Carbon Fuels Coalition.

Thank you for your consideration and I look forward to your progress to reduce carbon air pollution and the risk of extreme climate change.

Sincerely,

Brett Hulseley, MNS
President, Better Environmental Solutions
733 Struck Street, Number 44688
Madison, WI 53744

#46

PAGE 1

Q1: First Name (optional)	Maria
Q2: Last Name (optional)	Connelly
Q3: Company or Organization - if applicable (optional)	<i>Respondent skipped this question</i>

Q7: Please type your comment below.

Our state has to comply with the Global Warming Solutions Act. We can not allow anymore gas infrastructure to be built in Massachusetts. So called natural gas (there is nothing natural about fracking, the process of acquiring gas) is methane and methane is so much more potent at trapping heat in our atmosphere than carbon dioxide.

We, the residents of MA, hear your agency always referring to carbon emissions, but when are we going to hear you discussing methane emissions? Right now, its methane that is the real danger. Our state is already dealing with massive amounts of gas leaks due to the irresponsibility of the energy companies not fixing them. Do we need anymore gas infrastructure to worry about more leaks from? If we allow more gas infrastructure we will not be able to comply with the law.

Our state already holds massive amounts of gas.

I am asking you, the officials of the MassDEP, to please think about our state's future. Renewables are the future. No emissions from these types of energy. Please protect our beautiful state's environment and the health of the residents of our state.

Respectfully,
Maria Connelly

#47

PAGE 1

Q1: First Name (optional)

Maria

Q2: Last Name (optional)

Connelly

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

Our state has to comply with the Global Warming Solutions Act. We can not allow anymore gas infrastructure to be built in Massachusetts. So called natural gas (there is nothing natural about fracking, the process of acquiring gas) is methane and methane is so much more potent at trapping heat in our atmosphere than carbon dioxide.

We, the residents of MA, hear your agency always referring to carbon emissions, but when are we going to hear you discussing methane emissions? Right now, its methane that is the real danger. Our state is already dealing with massive amounts of gas leaks due to the irresponsibility of the energy companies not fixing them. Do we need anymore gas infrastructure to worry about more leaks from? If we allow more gas infrastructure we will not be able to comply with the law.

Our state already holds massive amounts of gas.

I am asking you, the officials of the MassDEP, to please think about our state's future. Renewables are the future. No emissions from these types of energy. Please protect our beautiful state's environment and the health of the residents of our state.

Respectfully,
Maria Connelly

#48

PAGE 1

Q1: First Name (optional)

Frederick

Q2: Last Name (optional)

Savlucci

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

Re: Comment on 310 CMR 7.00 & 310 CMR 60.00: Proposed Greenhouse Gas Emission Amendments

Generally, I believe that the approach taken by DEP in this regulatory effort is inadequate to the severity of the task at hand, and fails to adequately consider the previous failure of Massachusetts to enforce its own regulations concerning automotive generated pollutants, and the threat to the Massachusetts economy posed by worsening storms and flooding associated with climate change.

Just this week we have seen front page Globe coverage about the uniquely vulnerable situation of the Boston urban area to coastal flooding, and growing support encouraged by the City of Boston to consider sophisticated dam development similar to the efforts underway in Venice and Holland to deal with the consequences of climate change, and proactively protect particularly vulnerable and valuable assets. The problem requires a two pronged effort.

- first to stop the production of the greenhouse gases that are the root cause of the problem, and to stop the continued worsening of the situation;
- second, to recognize that the problem has built up over a few centuries, and is causing damage that is now

unavoidable that must be mitigated.

Yet the recommendations require no serious planning or action by Commonwealth agencies for either of these challenges. Let me comment on the most vivid examples:

First, for mitigating the damage now likely to occur:

If there is severe flooding in the Boston area, the MBTA tunnel system may be vulnerable to flooding which could incapacitate the Boston economy for lengthy periods of time. There should at least be a requirement to do a risk assessment, and develop strategies to safeguard against the most serious risks to the functioning of the transit system.

In addition and more fundamentally, there should be at least a requirement for a consortium of agencies, including Massport, MWRA, MBTA, and DPU to conduct a risk assessment, and begin planning for a positive set of mitigating actions, including the dam options now being advocated by the city of Boston.

Secondly, for the more fundamental problem of getting at the root cause of the problem caused by the transportation sector.

It is by far the excessive reliance on the auto which causes the problem, but the economic reliance of the region on auto mobility is such that the economic consequence of constraining auto accessibility generates strong political resistance because of the lack of suitable alternatives. But this is precisely the reason that earlier DEP regulations were promulgated in association with the Big Dig to simultaneously cap the availability of Parking at Logan, Downtown and South Boston and Cambridge, and improve public transportation so that the auto access constraints would be economically viable. These regulations included:

- a revised parking freeze at Logan adopted in the late 1980s, included in the 1993 SIP
- a commitment to replace the Orange Line Fleet beginning in 1995
- a commitment to extend the Green Line to Somerville and Medford by 2011
- a commitment to extend the Blue line to the Red Line at Charles Street by 2010

When these commitments were not being honored, and the Conservation Law Foundation sought to take legal action in the late 1990s, the commonwealth entered into a series of Administrative Consent Orders to mitigate the effects of the non-delivery on the required initiatives. These included:

- the construction of the "Missing Link" of the Silver Line, from South station to Boylston station on the Green Line, and then connecting to Roxbury (Dudley)
- the upgrading of the Fairmont branch service
- the implementation of an Urban Ring Circumferential service

None of these have been honored, slippage has been inordinate, yet the MBTA is carrying substantially more people on a significantly lower capacity and more crowded system, in violation of the outcomes presumably ensured by the earlier regulations.

Even more absurd, at this moment Massport is attempting to increase by 5,000 spaces the parking limit which it agreed to as part of the agreement to get the big dig implemented!

The very least that DEP should do is to stop allowing past regulations to be flouted by definitively refusing to increase the parking limit at Logan, and to insist instead on implementation of The Blue to Red Connector, the institution of South Station to Logan Express, and the implementation of missing link of the Silver Line.

Of course these cannot all be in place by 2020, but if DEP restricts its purview to actions which are feasible to complete by 2020, there is no way that significant progress can occur.

Moreover, it must be recognized that the unfortunate denialist nature of the new federal administration is actively undermining the regulations to improve the fuel economy of new automobiles that has been an assumption of past plans. There needs to be a reality check on the consequences of a less fuel efficient automobile fleet, which will increase the urgency of replacing much auto commuting with significantly greater transit mode share.

Consequently, I urge that DEP definitively reject any increase in the parking limit at Logan included in the current SIP, and open a new inquiry to develop a credible update on the variety of SIP commitments and ACO s previously agreed to , with suitable additions to make up for the time that has been squandered by inaction.

Moreover, I urge that DEP should undertake a sensitivity analysis of the consequences of a weakening of federal regulation of the auto fleet, and the consequent greater reliance on mode shift to transit and pedestrian mode share required to meet the needs of the region, and develop a significant set of transportation initiatives to be presented for public comment in a revised proposed reputation.

#49

PAGE 1

Q1: First Name (optional)	Robert
Q2: Last Name (optional)	White
Q3: Company or Organization - if applicable (optional)	Massachusetts Institute of Technology

Q7: Please type your comment below.

Comment on Clean Energy Standard: 310 CMR 7.75

The inclusion of nuclear power as an eligible clean energy source by MassDEP in the CES is a forward thinking way to think about reducing emissions from electricity production. Our State's energy policy should be focused on how to reduce emissions and not on what technologies should be used to do so. All technologies have benefits and drawbacks and including all low-emission technologies (including nuclear) will let utilities decide what combination of solar, wind, natural gas, hydro, and nuclear can produce the most reliable, lowest cost electrical grid that meets more stringent emissions requirements. Massachusetts' energy policy should focus on rapidly reducing emissions from electricity production regardless of source (not focusing solely intermittent solar and wind) and the proposed regulation are a great step.

I support MassDEP's inclusion of nuclear power as a clean energy technology and believe that Massachusetts should continue to recognize the value of low-emission and reliable electricity production from nuclear power plants. If climate change is a serious threat to humanity, we will need every tool we have to fight it and can't afford to dismiss solutions like nuclear power.

#50

PAGE 1

Q1: First Name (optional)	Richard D.
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Q2: Last Name (optional)

Tabors

Q3: Company or Organization - if applicable (optional)

Tabors Caramanis Rudkevich

Q7: Please type your comment below.

PLEASE SEE THE ATTACHMENT FOR A FULL TEXT OF THE COMMENTS FROM RICHARD TABORS OF TABORS CARAMANIS RUDKEVICH

#51

PAGE 1

Q1: First Name (optional)

Wig

Q2: Last Name (optional)

Zamore

Q3: Company or Organization - if applicable (optional)

Respondent skipped this question

Q7: Please type your comment below.

Please consider taking an aggressive stance toward reduction of Black Carbon which has a 20 year Global Warming Potential of 3200 times that of CO2 on a mass basis. Black Carbon is a top target of the California Air Resources Board short Lived Climate Pollutant Reduction Strategy and has been incorporated into AR5 and its impact math there is based upon the 2013 consensus paper by Tami Bond (and others) that appeared as "Bounding the role of black carbon in the climate system: A scientific assessment." Journal of Geophysical Research: Atmospheres . Black Carbon is an aerosol (particulate component) and along with aggressive reduction of other "SLCPs" like methane has the potential to cut climate change over the next several decades by half, buying significant time to make longer term progress. Black Carbon in advanced economies is emitted primarily by inadvertent fires and by use of diesel in surface transportation and in off road equipment and use of Jet A aviation fuel. In Massachusetts the MBTA is the largest user of diesel, consuming roughly 20 million gallons per year. Aviation that originates at Logan Airport burns roughly 20 million gallons of Jet A on the tarmac and an equal amount in the atmosphere near Logan below 3000 feet. The MBTA should immediately do all it can to eliminate its diesel use and Logan and FAA should be asked to dramatically reduce or offset aviation use of Jet A.

Thanks, Wig Zamore

#52

PAGE 1

Q1: First Name (optional)	Kelly
Q2: Last Name (optional)	Blynn
Q3: Company or Organization - if applicable (optional)	MIT

Q7: Please type your comment below.

I'd like to commend DEP for certain aspects of this plan with respect to transportation, particularly 1) Setting binding, declining targets for the sector and for the state fleet, and 2) Requiring MassDOT and the MPOs to quantify the climate impact of new projects in their formal planning processes to enable a climate assessment of new infrastructure projects. However, while these aspects are important steps, particularly for reaching the upcoming 2020 target, much more work is needed to continue on a sufficiently ambitious path to reach Massachusetts' 2050 goal, given that nearly complete decarbonization is required. Without a long term view, thinking only about meeting short term targets could lead to technological lock-in with dead end technologies from an emissions reduction perspective. For example, while investing in additional natural gas fleet vehicles and buses may provide some short term emissions reductions, their emissions reductions potential pales in comparison to the potential for electric buses and vehicles that, once connected to a grid that is becoming cleaner over time, will also become cleaner. In addition to leaving out the long term view, this plan also seems to lack specific policy mechanisms or funding mechanisms that can spur a transition to more sustainable transportation. Given these considerations, I'd like to recommend the following:

1) Set transportation sector-wide and state fleet-wide targets beyond 2020, all the way to the 2050 target date.

2) There are now multiple transportation decarbonization pathways that researchers believe are possible, nearly all relying on both behavioral (VMT reduction) and technological solutions. Given the importance of both types of solutions, these proposed regulations do not seem to address solutions to reduce VMT, or shift modeshare to sustainable modes of travel as is outlined in the state's GreenDOT report. I urge you to include in the final draft of these regulations targets and policy mechanisms to support alternatives that can drive a shift in travel behavior, with all its well-documented co-benefits, towards more sustainable and active transportation modes. With less assurance that federal fuel economy standards will continue to be enforced, or continue at all under this administration, driving state policy forward to reduce VMT will be essential.

3) With respect to the technological side, I believe much more is possible with respect to deploying electric vehicles in public fleets, as well as private fleets. Currently, the state offers a small amount of subsidy per year for public fleets to cover the cost of transitioning to electric vehicles. Already, multiple electric vehicle models - particularly transit buses - , are cost competitive on a total cost of ownership basis compared to conventional vehicles, due to their lower fuel and maintenance costs, and prices continue to drop as battery technology improves. In the electricity sector, Massachusetts long ago mandated that electric utilities make all available cost effective investments in energy efficiency compared with new electricity generation, and provided mechanisms to enable those investments such as energy savings performance contracting legislation and a fund for energy efficiency. Why not mandate that public fleets must purchase electric vehicles if they are cost effective with respect to conventional vehicles, and support financing mechanisms such as energy savings performance contracts or low interest financing to jump start fleet transition? This way, the state could better leverage limited public subsidies and accelerate electric vehicle deployment, and eventually extend those same mechanisms to help transition private fleets and individual vehicles as well. This is just one idea that could help spur a much more accelerated timeline for vehicle emissions reductions to reach the state's 2050 targets.

Given the state of our climate's future, it is essential that Massachusetts lead on this issue. Few places in the world have figured out how to effectively reduce transportation emissions; Massachusetts has the opportunity, and the responsibility, to be a leader and show a path forward for more sustainable transportation options that improve quality of life. Many thanks for your consideration,

Kelly Blynn
Graduate student at MIT
Somerville resident