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Cc: [Dominici, Francesca](#); [Cork, Michael](#); [EEA DEI Office \(EEA\)](#)
Subject: Public Comment: EFSB / DPU Stakeholder Sessions Cumulative Impacts Analysis Proposed Approach
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Attachments: [20250521_MassCEC ACT Future of the Grid.pdf](#)

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To whom it may concern,

I hope this note finds you well. I'm writing to share a formal public comment based on the [EFSB / DPU Stakeholder Sessions](#) held in April and May, particularly Session 4 "Cumulative Impacts Analysis and Site Suitability Criteria." While I wasn't able to participate at the time, I'm part of a startup spinout from the [Dominici Lab](#) at the Harvard School of Public Health focused on air pollution & public health impacts. The lab's pioneering research provides impact analysis that we believe should be included in the holistic impact analysis process proposed by this regulation.

The tool under development works by 1) quantifying what comes out of smoke stacks using dispersion modelling, 2) measuring the people impacted by the air pollution as well as socio-economic & demographic data, and 3) ties this data to an economic cost based on the healthcare burden of this increased exposure (hospitalizations and morbidity). Our solution also provides a scenario-planning option for developers to model different energy scenarios -- e.g., shifting from natural gas to a mix of renewables -- to offer alternatives that may reduce impact.

We have [piloted this process with the Southern Environmental Law Center](#) in Virginia, where our health impact analysis led one community to oppose a 3.5GW natural gas plant to power a data center complex in their community. The plant would have increased PM2.5 exposure for 1.3M people, including 17,600 who would be exposed to severe levels of air pollution. This could cost the state \$31M+ in healthcare costs due to hospitalizations and health complications. We went on to say,

"The socio-economic analysis reveals that, on average, the Census Tracts that would experience an increase in PM2.5 concentrations above 0.10 µg/m3 are characterized by an older population, lower median household income, and a poverty rate almost double that of Virginia's state average. Additionally, the racial composition of these tracts shows an overrepresentation of Black individuals as compared to Virginia's statewide average, while both Hispanic and Asian populations are underrepresented. Furthermore, the

median property value in these tracts is less than half of the state's population-weighted average."

We believe that holistic impact should include the true cost of a project's externalities -- and when it comes to health impacts, air pollution is significant. Our company can provide this analysis for utilities, developers, or municipal / community leaders in Massachusetts. I'm including examples of analysis we presented during the Future of the Grid event held by MassCEC and ACT in early May as an example of our outputs. We found that currently, air pollution impact to power data centers is concentrated on the South Shore in many EJ communities.

I look forward to the opportunity to discuss these comments with you, and hope that our approach can be considered in the proposed regulations this year. Thank you for your consideration.

Best,

Victoria Pisini

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