

November 28, 2022

Secretary Bethany A. Card
Chair, Energy Facility Siting Board
Secretary, Executive Office of Energy and Environmental Affairs
Energy Facility Siting Board / Department of Public Utilities
1 South Station, 5th floor
Boston, MA 02110

Subj: EFSB 22-01: Petition of Eversource pursuant to G.L. c. 164, §§ 69K-69O and 980
C.M.R. §§ 6.00 et seq., for Approval to Construct a New Substation in East Boston

Dear Chair Card and Members of the Siting Board:

We are writing to provide the Siting Board comment and recommendation on the consolidated Certificate sought by Eversource for a new substation proposed in East Boston. We testified as experts in this proceeding on behalf of Boston Residents Group.

As Attorney General Healey has expressed concerning this substation, East Boston already bears a disproportionate burden of industrial infrastructure and the associated environmental and health risks. These include Logan Airport and extensive off-airport support operations, which widely benefit the Commonwealth but which adversely and directly burden East Boston and its residents.

Recognizing the impacts of energy facilities and other such uses on environmental justice communities, in 2021 the legislature passed and Governor Baker signed the Roadmap Law - An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy.

The Roadmap Law includes provision for the Siting Board to direct that enhanced environmental and environmental justice analysis for the individual and cumulative impacts be carried out to inform its decision-making on proposed facilities.

Accordingly, we recommend that the Siting Board not grant the requested Certificate, as the required showing has not been made that project energy and environmental benefits outweigh its burdens on the East Boston community.

We further recommend that the Siting Board direct that enhanced environmental analysis and environmental justice analysis be carried out for the proposed substation, as envisioned by the Roadmap Law, before considering any Final Decision on the substation.

Sincerely,

Ben Downing
Penn Loh
Brita Lundberg, M.D.
Juliane Manitz
Heather O'Brien