



*****For electronic submission only*****

November 28, 2022

Secretary Bethany A. Card
Chair, Energy Facilities 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

RE: EFSB 22-01: Petition of Eversource pursuant to G.L. c. 164, 69K-690 and 980 CMR 6.00 et seq., for approval to construct a new substation in East Boston

Dear Secretary Card and Members of the Energy Facilities Siting Board:

On behalf of Greater Boston Physicians for Social Responsibility (GBPSR), I am again writing in support of East Boston residents, organizations, and elected officials in their efforts to bring attention to the serious health concerns regarding the proposed Eversource substation expansion in East Boston—an expansion opposed by Attorney General Maura Healey; by the residents of Boston in an open referendum; and by legislators.

GBPSR membership includes nationally-recognized experts in public health, cancer epidemiology, occupational medicine, environmental health, emergency medicine, disaster preparedness, and the health effects of climate change. We are concerned that the human health impacts of this project will disproportionately affect the environmental justice communities in East Boston who live in close proximity to the substation. Industries that release air pollutants or other toxic chemicals, coupled with climate change, present unique health risks to communities living nearby. Cumulative impacts from multiple stressors faced by environmental justice

communities may amplify these adverse effects. Physicians are increasingly concerned about policies, land-use decisions, regulations, and market-based forces that continue to propagate and magnify social inequalities; low-income communities of color who live in close proximity to industry suffer disproportionately from the pollutants these industries generate.

The dangers of this substation expansion are several:

1. Lack of an evacuation plan or any formal consideration of safety concerns;

2. Lack of consideration of flooding and explosion hazards: climate change will continue to make this location in a known flood plain at ongoing and increasing risk of flooding and therefore explosion.

The risk of explosion is, unfortunately, far from hypothetical. A large explosion occurred in the town of Newton the day before I last offered testimony on this issue to the EFSB. The explosion created a fireball that took hours to put out, and the flames leapt some 70 feet in the air. The difference between the Newton and East Boston location, however, is that the Newton Eversource substation is surrounded by a large cemetery. A similar explosion at the potential East Boston location could result in substantial numbers of dead and injured, since there is a playground and housing immediately adjacent. [Research](#) has shown that high levels of air pollution and salinity contribute to substation failure; both high salinity and high levels of air pollution are significant environmental risks for explosion in this proposed location.

3. Air pollution. The construction and operation of this substation poses significant hazards to respiratory health. Emissions from construction and operation will release carcinogens, oxides of nitrogen and volatile organic compounds that become smog. These known respiratory irritants exacerbate asthma, have the potential to cause cancer and will affect many living within the airshed of the substation, which is, by definition, a 10-mile radius; these emissions will not just impact those living in the vicinity, but the many children who attend schools nearby.

4. Lack of consideration of cumulative health impacts

In addition, no consideration has been given to the cumulative health impacts of the numerous environmental hazards to which this population is already subjected. Janet Rothschild, hearing officer at Massachusetts Department of Environmental Protection, has appropriately called for consideration of cumulative health impacts when approving new infrastructure projects. The recent Roadmap bill passed in the last MA legislative session now requires consideration of cumulative health impacts for all new construction: such an assessment should properly consider the cumulative health effects of the respiratory carcinogens and include a quantitative analysis of the combined pollutant burden on cancer risk, non-cancer risk, and all-cause mortality using EPA risk estimates.

5. Serious climate risks and disregard for environmental justice concerns

Finally, this facility will worsen climate change since the substation will serve and support Mystic power station, one of the five largest polluters in the state. The need to address climate risks grows ever more urgent. Each successive climate flooding event in East Boston is more extreme and makes the proposed location more ill-considered than it appeared at the time the project was first advanced. In addition, the need to incorporate consideration of environmental justice concerns, which was ignored in the original decision making, is now a legislative mandate in the state of Massachusetts, and should inform and be a decisive factor in EFSB's final decision.

7. The Commonwealth should take action to reduce health inequities, not worsen them; lack of economic need; failure to consider alternative sites

The Commonwealth of Massachusetts should be actively addressing the known existing elevated levels of air toxics that put people in East Boston at higher risk for respiratory disease and cancer. Mobilizing the public health department to address the very serious consequences of existing air pollution rather than increasing those levels through this unnecessary project is particularly critical in light of the COVID-19 pandemic and the observed association between areas of high air pollution and increased mortality from COVID-19. Furthermore, no economic need has been demonstrated for this facility and no consideration has been given to locating it at

alternative sites like Massport, which will receive 40-60% of the energy generated by the substation and will therefore be its greatest beneficiary.

A dangerous proposal

Locating this substation in a dense urban area whose population is already burdened with high rates of respiratory illness and cancer is a threat to the health and safety of thousands of people in the surrounding communities, including environmental justice tracts. No mitigation strategy is sufficient to ensure that this substation can safely operate, given its highly exposed location in a known flood zone and proximity to other explosive infrastructure like fuel tanks. The risk of explosion and fire alone make this location unsafe and indeed reckless.

For the reasons set forth herein, the EFSB should grant the Petitioners' request for Certificate denial. The Eversource substation represents an unacceptable risk to public health. There is no way to allow it to go forward that is protective of the health and safety of the surrounding communities – environmental justice communities that should be offered greater, not less, protection under Massachusetts state law.

To achieve Governor Baker's net zero climate goal we need an electricity system that supports the delivery of clean, reliable, and cost effective energy. Expanding this substation has not been shown to be necessary to the citizens of Massachusetts and would appear to be advanced at the expense of Massachusetts individuals and families living within environmental justice communities like East Boston.

Thank you for your work on behalf of all the citizens of Massachusetts and for your serious consideration of the health issues and populations at risk. Thank you for fulfilling your fiduciary duty to the residents of Massachusetts.

Sincerely,



Brita E. Lundberg, M.D.
Chair of the Board, GBPSR