



November 28, 2022

Secretary Bethany Card
Chair, Energy Facilities Siting Board
Executive Office of Energy and Environmental Affairs
100 Cambridge St. Suite 900
Boston, MA 02114

For electronic submission only

RE: Energy Facilities Siting Board Final Decision on NSTAR Electric Company d/b/a Eversource Energy, in EFSB 14-04/D.P.U. 14-153/14-154, the facility approved by the EFSB in its Final Decision dated December 1, 2017

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

We are writing as physicians and members of Climate Code Blue, an organization that includes experts in internal medicine, psychiatry, infectious disease, pediatrics, air pollution, and emergency medicine who are focused on addressing climate change and environmental justice. We are all residents of the greater Boston area and many of us work in Boston's hospitals caring for residents of Boston.

We write to express our concern about the siting of a substation in an environmental justice community in East Boston, which is already exposed to pollution from other industrial sites and the airport. There is no reason to add to the cumulative health harms already experienced by this community with a substation, especially when other sites are available, like the one in Massport.

As we outlined in a previous letter, health and safety considerations that have been ignored by the Siting Board, despite the Massachusetts *Next-Generation Roadmap for Massachusetts Climate Policy Law* mandating that environmental justice and public health be considered in the deliberations, include:



1. The substation is located in an area already prone to recurrent flooding. This poses fire hazards for which there is no delineated evacuation plan. As extreme weather events and flooding continue to worsen, these safety risks have grown only more urgent since the original letters were filed.
2. The environmental justice community in East Boston is subjected to numerous environmental hazards, including air pollution from the airport and other industrial operations. There has been no cumulative health assessment taking into account additive effects of the pollution from the construction and operation of the substation on rates of respiratory illness, cardiovascular illness, cancer and all-cause mortality.
3. The siting of the substation in a dense urban area and next to a park where children play poses a threat to the sparse open space available to the community. Green space is important for physical and mental well-being and is an important public health good shared by the community.

Locating this substation in a dense urban area in an environmental justice community is a textbook example of environmental racism. 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.

An independent health impact assessment should properly consider the cumulative health and safety impacts of the substation before any decision is made. There is precedent for this in Massachusetts: Janet Rothschild, hearing officer at Massachusetts Department of Environmental Protection, called for consideration of cumulative health impacts when approving new infrastructure projects, and considerations for public health and environmental justice are required by the *Next-Generation Roadmap for Massachusetts Climate Policy Law*.

We urge the EFSB to grant the Petitioners' request for Certificate denial. The Eversource substation represents an unacceptable risk to public health and safety.

Sincerely,

Climate Code Blue Leadership Team

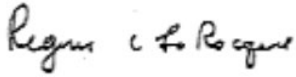





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