

From: [John Antonellis](#)
To: [Bartley, Geneen \(DPU\)](#)
Cc: [John Walkey](#)
Subject: Certificate of Environmental Impact and Public Interest Docket No. EFSB 22-01
Date: Monday, November 28, 2022 6:29:07 PM

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Dear Ms. Bartley:

My name is John Antonellis and I am a long time resident and homeowner in the Eagle Hill neighborhood of East Boston. I am writing to provide public comments regarding the Certificate of Environmental Impact and Public Interest: Docket No. EFSB 22-01.

There are several reasons why I strongly oppose granting Eversource a Certificate of Environmental Impact and Public Interest.

From the Environmental Justice perspective, the whole issue is based on proceedings in which non-English speaking residents were not allowed to express their concerns several years ago and the more recent efforts to rectify this situation have not allowed them to express their original concerns. Further, the latest proceedings are in violation of the Roadmap Law. There has been no substantive analysis of the cumulative impact of this land use on the community. And the decision is being rushed to avoid scrutiny by the new Gubernatorial administration, as well as the results of the Massachusetts Environmental Policy Act review, and the finalization of an environmental justice strategy. This will perpetuate environmental injustice.

This certificate of Public Interest will actually shortcut the Public Trust Doctrine as part of the state's Chapter 91 Public Waterfront Act. The EFSB will provide a Ch. 91 Waterways License without addressing the concerns raised by GreenRoots and CLF on that license. The nature of an appeal of a Ch. 91 license decision under the normal process is different from the appeal under the current certificate process. The Department of Environmental Protection's (DEP) Waterways division's conclusion that the substation is a water dependent use is incorrect and the EFSB's agreement is also incorrect. There is nothing water dependent about a substation and no need to have it located at this site for its proper function, and in fact its functions are at risk by being located at this site.

When considering the impacts of climate change on this site, the location for this substation is in filled tidelands that by any reasonable measure will be subject to flooding in the near future, either through sea-level rise, coastal storm surge, land flooding due to increased heavy rainfall events overwhelming storm water systems, or most likely, a combination of all three phenomena. The additional cost of repairs and eventual relocation of this critical infrastructure to a safer locale have not been considered by the EFSB, which is required to consider cost. They have shortened the time frame used to consider the cost, even though from a climate planning perspective this is not wise and will result in additional cost and risk being borne by an environmental justice community. In terms of planning for the future, Eversource has used one very conservative approach to predicting future electricity transmission needs while applying a different philosophy to predicting future flood risks.

Eversource has yet to convince those opposed to the substation of its need. Over the 8 years of this project's development Eversource has repeatedly changed the reasoning as to why this infrastructure was needed, while refusing to provide clear and transparent data to the public to justify these claims. What is clear is that by far the largest beneficiary of this infrastructure and the party with the most need for this substation is Massport. Logan International Airport continues to expand and increase its electricity demands, including things like the expansion of the International Terminal E, as well as increasing numbers of EV rental cars. Massport is constructing new electrical infrastructure on its campus, which is better protected from flooding than the proposed site; is located away from residential areas and playgrounds; has 24 hour State Police security; and is located closer to the Eversource customer with the largest demand. The EFSB has at no point considered whether or suggested that an effort be made to locate the substation at Logan International Airport.

Given the overwhelming opposition from residents, advocates, and elected officials, as well as the horribly unjust track record of this specific project's process through the EFSB, the absolute least that the EFSB can do, and should do, is to deny this certificate and allow the Governor's appointees to the EFSB to weigh in on this project. In the same way that the Board has in the past pushed Eversource to talk with the City of Boston to move the site of the substation, they should also require that the Company talk to Massport about the same idea.

Please do the right thing and deny granting Eversource a Certificate of Environmental Impact and Public Interest.

Thank you for your time.

Sincerely,
John Antonellis
93 Lexington Street
East Boston, MA 02128