



M. Kathryn Sedor, Esq., Presiding Officer
Energy Facilities Siting Board
One South Station
Boston, MA 02110

By email to: Kathryn.sedor@mass.gov

February 18, 2019

Dear Ms. Sedor,

We are writing to you in agreement with East Boston community concerns about the Eversource proposal to construct and maintain an electrical substation on East Eagle Street in East Boston. First, site of the proposed substation is located within a Chapter 91 Designated Port Area, which expressly prohibits such non-water-dependent uses. Second, we share concerns raised by GreenRoots about adverse impacts on the health and safety of residents.

According to 301 CMR 25, Waterways regulations (301 CMR 9) and Municipal Harbor Plans regulations (301 CMR 23), DPAs seek to ensure that water-dependent industrial uses are encouraged in areas that contain three essential components for their success:

- Waterways and developed waterfronts (especially those with deep enough channels to support larger vessels),
- Backlands (the land situated behind these waterways and waterfronts) of supporting industrial facilities and operations, and
- Transportation and public utilities appropriate to service industrial operations.

As an increasing percentage of Boston's waterfront is converted to residential and commercial development, such areas appropriate for water-dependent industrial uses are becoming increasingly rare. Therefore, the "industrialized coast should be preserved to the maximum extent practicable in order to meet the long term, cumulative space needs of the water-dependent industries" (301 CMR 25).

As a result, DPAs are currently restricted to those activities defined in 310 CMR 9.12(2)(b-d), including as examples marine terminals, commercial fishing facilities, marine repair and construction facilities, manufacturing facilities that rely primarily on bulk receipt, or facilities accommodating the shipment of goods by water. The proposed substation is not serving as an ancillary use to the DPA. In fact, the growth of energy demands are not being driven by an increase in DPA industries, but rather by the development of the larger community of East Boston and Logan Airport needs. The proposed substation is a non-water-dependent use unrelated to the requirements of adjacent maritime industry and therefore should not be sited within the DPA.

We recognize the need for DPA regulations to be updated to address changes in maritime industrial uses and climate change risks. We don't, however, support piecemeal development of existing DPAs for other uses. The following map indicates that Eversource's property (see arrow) lies entirely within the Chelsea Creek DPA, one of only ten remaining DPAs in Massachusetts.



Second, we are concerned about the close confluence of 1) an existing densely-populated residential neighborhood, 2) an existing tank farm with 16 large petroleum tanks, and 3) a proposed high voltage electrical substation. We are concerned about the potential for loss of life if there were a fire caused by natural or intentional disasters. We echo concerns raised by GreenRoots about the need to consider EMF on youth health.

Again, we want to express our support of community efforts to block construction of the Eversource substation at its proposed location. We encourage Eversource instead to work with the City of Boston and Massport to site necessary infrastructure away from residential areas and above flood-prone areas. We strongly recommend a deeper dialogue with Massport on the opportunity to site this infrastructure within land controlled by Massport outside of the DPA. I may be reached at 781-316-3438 or patrick.herron@mysticriver.org.

Sincerely,

Patrick Herron
Executive Director