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U.S. SENATE CLIMATE CHANGE TASK FORCE

# United States Senate

November 26, 2019

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DIRKSEN BUILDING  
WASHINGTON, DC 20510-2107  
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413-785-4610

The Honorable Kathleen A. Theoharides  
Chairman, Energy Facilities Siting Board  
Secretary, Executive Office of Energy and Environmental Affairs  
Department of Public Utilities  
One South Station  
Boston, MA 02110

Re: EFSB 14-04/D.P.U. 14-153/14-154

Dear Chairman Theoharides,

I write in support of the request for the Energy Facilities Siting Board (ESFB) to reopen its determination of need for the construction of a new electrical substation on East Eagle Street in East Boston, as proposed by Eversource. The project has gone through substantial planning changes since it was originally proposed in 2014 and approved in 2017, and residents of East Boston, public safety, and environmental justice advocates have a strong case against the location and necessity of the current site proposal. I urge the EFSB to give full consideration to these concerns and to reopen the 2017 decision to conditionally approve the construction of this substation.

The current proposal for the East Boston substation is within 800 feet of eight million gallons of jet fuel and directly across the street from a popular playground, posing a potential fire and exposure risk to children and the broader community. Fears of fire are not unfounded; two substations, in Madison, Wisconsin and Queens, New York, have exploded in the past year alone.

Additionally, the area in which the proposed substation would sit has also flooded twice over the past year—floods that are only likely to get more frequent and severe as climate change continues to exacerbate rising seas and extreme storms. As the substation is estimated to be in service through 2070 and beyond, climate projections for heavy precipitation events, rising sea levels, and storm surge flood zones need to be fully integrated into any review process.

These site-specific concerns are part of a broader community discussion around whether the substation is needed at all, as Boston works toward its goal of achieving city-wide carbon neutrality by 2050.<sup>1</sup> An analysis from the Union of Concerned Scientists found that for a little over half the cost of a new substation, East Boston could develop enough solar capacity to power around 2,000 homes.<sup>2</sup> Other research has questioned Eversource's claim that a new substation is required to meet increased demand, as ISO-New England projects that the regional load forecast is expected to decline.<sup>3</sup>

Furthermore, it is important that everyone in the community is able to understand the potential impacts of this substation. I encourage the EFSB to provide informational materials and public hearings with translation services, so that all residents of East Boston can inform themselves, participate in this process, and fulfill their civic duty. Information should be accessible to all, without language being a barrier. In this process, EFSB should take into account East Boston's constituency and the vibrant mix of cultures that comprise it.

I urge the EFSB to consider community concerns and Massachusetts' climate and energy goals in its review of this project, and to work to ensure that the review is inclusive, transparent, and uses up-to-date data. As we work to act on climate and address past environmental injustices, we have an opportunity now to conduct a robust engagement process with the East Boston community in order to hear and address their concerns. I thank the Board for its consideration of this request.

Sincerely,



Edward J. Markey  
United States Senator

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<sup>1</sup> *Climate Action Plan: 2019 Update*, City of Boston (October 2019), [https://www.boston.gov/sites/default/files/embed/file/2019-10/city\\_of\\_boston\\_2019\\_climate\\_action\\_plan\\_update\\_4.pdf](https://www.boston.gov/sites/default/files/embed/file/2019-10/city_of_boston_2019_climate_action_plan_update_4.pdf)

<sup>2</sup> *East Boston's Opportunity for a Clean Energy Transition*, Union of Concerned Scientists (November 2019), [https://ucs-documents.s3.amazonaws.com/clean-energy/LocalCleanTransition+Tech+Appendix+V\\_Final.pdf](https://ucs-documents.s3.amazonaws.com/clean-energy/LocalCleanTransition+Tech+Appendix+V_Final.pdf)

<sup>3</sup> Bryndis Woods testimony in Nos. EFSB 14-04A/D.P.U. 14-153A/14-154A. <https://static1.squarespace.com/static/5936d98f6a4963bcd1ed94d3/t/5cffcb70771cbf00015edeba/1560267632700/Woods+testimony+7June2019+%281%29.pdf>