

July 7, 2023

*Via Online Comment and Electronic Mail*

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Subject: Review Comments on the Draft Environmental Impact Report for the Eversource Gas Company Western Massachusetts Gas Reliability Project, EEA #16556

Dear Secretary Tepper,

The Springfield Climate Justice Coalition, with the undersigned partners and individuals, offer the following comments on the May 2023 Draft Environmental Impact Report (“DEIR”) filed with the MEPA Office by the Eversource Gas Company of Massachusetts for their “Western Massachusetts Gas Reliability Project” proposal to construct a new 5.3-mile long, 16-inch diameter gas pipeline, a new Point of Delivery (“POD”) facility in Longmeadow, and upgrades to the existing Bliss Street Regulator Station in Springfield as described in the ENF filed on May 16th, 2022. The focus of the Coalition’s review was the impacts that the proposed project will have on the City of Springfield, the environmental justice communities the pipeline will traverse, the city’s residents, and the impact gas expansion will have on the Commonwealth’s ability to reach its net zero mandate of 2050.

Springfield Climate Justice Coalition is a diverse coalition of community, social, civic, and public health organizations, faith based groups, and businesses, that aims to bring Springfield to the forefront of urban communities on these issues, and create a city where all of our residents can breathe clean air. Since 2014 we have brought together organizations across the City to take on the issues of Climate Change and Environmental Justice at the local level, out of a deep concern for the future of our environment and public health.

The coalition finds the May 2023 DEIR did not provide all of the information and analysis that the Secretary’s Certificate required. Also we find some of the information that was provided was misleading and/or out of date. We respectfully request that a determination be made finding the Draft Environmental Impact Report submitted on this project does not adequately and properly comply with MEPA and its implementing regulations, so requires the filing of a Supplemental

DEIR. We hope that such further alternatives analysis will lead the Company to not simply dismiss the No-Build Alternative out-of-hand but to come to the recognition that their proposal's unnecessary and adverse impacts to the City of Springfield, its environmental justice communities, all ratepayers and the environment, will require options and clean energy solutions not previously envisioned.

## **Environmental Justice**

### **Public Engagement**

In the "Certificate of the Secretary of Energy and Environmental Affairs on the Environmental Notification Form," ("Certificate") the Secretary set forth some stipulations on what Eversource was expected to include in the DEIR in regards to public engagement and environmental justice. We believe that Eversource did not meet these conditions in their engagement with the Springfield community or in their analysis of environmental justice issues.

We believe that their outreach in the Springfield community, both through in person and virtual events, advertisements and written materials, was inadequate and did not meet these criteria. These are the specific benchmarks set forth by the Secretary that Eversource did not meet

- A) "Holding community meetings during weekend or evening hours, at accessible locations near public transportation, and/or through zoom or other similar web-based service if requested or determined to be more effective for reaching EJ populations." (Certificate at 13)

Zoom is not an effective way to reach many members of EJ communities in Springfield, who may not have stable wifi, computers of their own, or quiet and private home spaces where they can focus on a virtual meeting. We know this because of the difficulty that many households had during remote learning in the first year of the covid pandemic. We cannot assess the attendance levels of Springfield residents at the "open house meetings," because participants were unable to see each other, speak, or interact; However, we did note during the MEPA virtual hearing, there were significantly more Longmeadow residents than Springfield residents, and few to no Springfield residents who live along the proposed pipeline route.

We believe that Eversource's in-person, virtual, and written outreach to the Springfield community was inadequate and only succeeded in informing a very small number of Springfield residents about the proposed project. Based on the number of interactions listed for their various pop up events, they spoke to less than 150 people, not all of whom were Springfield residents. We have spoken to more than 500 Springfield residents, the vast majority of whom had never heard of this proposed project. Of the few who had heard of it, most had heard of it via outreach

and materials from the Springfield Climate Justice Coalition and the Longmeadow Pipeline Awareness Group, not from Eversource's efforts.

- B) That Eversource make materials about the project easily understandable to the public in “an effort to ensure the community understands the potential impacts of the project and can provide meaningful input.” (Certificate at 13)

We believe that the outreach and education materials that Eversource distributed were biased, misleading, and omitted many important impacts that the pipeline could have, resembling propaganda more than objective and impartial information about the potential project and its impacts. These materials not only failed to “ensure the community understands the potential impacts of the project,” but in fact obfuscated several of those impacts, thereby preventing many residents from Springfield from having the opportunity to provide informed and meaningful input.

Many of the potential impacts of the project (increased air pollution, toxicity of methane, proximity to schools, risk of explosions) were glossed over or entirely omitted from presentation and outreach materials. Those outreach materials also included many inaccuracies and misleading points regarding the climate impact, safety, and reliability of the project. The people of Springfield cannot provide meaningful input on the project if they do not understand the potential risks and negative impacts that this project could have.

Moreover, when Springfield and Longmeadow residents asked questions about the omissions, inaccuracies and misleading points in their presentation materials at the open house meetings, the MEPA site visit, and the MEPA hearing, the Eversource representatives present either answered our questions with more misleading or inaccurate claims, or did not have responses to our questions at all.

There are a number of facts that were confirmed in this report that Eversource officials denied or misrepresented at their open house meetings, the MEPA site visit, and the MEPA hearings. An incomplete list of these facts includes the reality that there will be emissions from venting at the POD station and leaks, the potential for flooding at the Bliss Street Station during extreme weather, and the fact that there will be new above ground facilities at the Bliss Street Station.

However, the presentation of some facts in the report were inconsistent, as they were confirmed in some sections and denied or omitted in others. For example, the risk of gas leaks was acknowledged in section 1.6, which described the training that personnel would receive in order to respond to malfunctions, failures, leaks, and other emergency situations. However, in section 1.5 - Listed Potential Environmental and Public Health Impacts - and in a number of other sections that addressed potential impacts and mitigation measures, the long-term risk of gas leaks went unmentioned.

- C) “Identifying specific neighborhoods, residents or other communities surrounding the project site that may be affected and considering targeted outreach and engagement strategies directed at such areas.” (Certificate at 13)

Table 1-2, listing groups and entities that Eversource communicated with about this project, does not include several key communities that would be impacted by this project.

- The 3 schools located within ¼ mile of the pipeline route or POD station: Sumner Ave School and Preschool, South End Middle School, Wolf Swamp Elementary School. The schools located in Springfield, Sumner Ave School and South End Middle School, have a high percentage of students with asthma who would suffer from increased air pollution and who would be more likely to have life-threatening medical emergencies in the case of a gas leak. It is particularly disturbing that Eversource did not do outreach to Sumner Ave School and Preschool, given that it is listed as a sensitive receptor for every possible route for the pipeline, even given the extremely narrow range that Eversource is using to qualify which buildings and facilities would be “directly impacted.”
- Ellen Rice Rest Home (less than 500 feet from pipeline route) and Maple Hill Rest Home (less than .5 miles away). Given that both facilities serve populations with severe disabilities, evacuation in the case of a leak or fire could be difficult and slow moving.

According to Section 1.8 of the DEIR, Eversource only did direct outreach to residences and businesses located within 300 feet of the pipeline route and within ¼ mile of the Longmeadow POD and Bliss Street Regulator Station. Elsewhere in the DEIR, Eversource states that only residences and businesses within 100 ft of the pipeline were considered as those that could be impacted by the project. This does not include the number of residences, businesses, schools, medical centers, and other community spaces that could be directly impacted by the risks of leaks, fires, and explosions that this proposed project would pose.

Our estimations for the direct blast zone for an explosion from the pipeline ranges from 500-1000 ft; both Sumner Ave School and Preschool and the Ellen Rice Rest Home are within the 500 ft radius. The evacuation zone in the case of a leak, fire, or explosion would range much farther than a measly 100 ft. Increased air pollution from leaks and venting would also affect a much wider range than the outreach that Eversource performed.

### **Environmental Justice Analysis**

The Secretary’s ENF certification also set forth some criteria for Environmental Justice Analysis. Eversource’s DEIR does not meet those criteria on multiple counts.

The ENF Certification states that the DEIR “should analyze any other relevant short-term and long-term environmental or public health impacts of the project, including construction period activities” (Certificate at 14). We consider their analysis of short-term and long-term

environmental or public health impacts to be inadequate. They focused almost entirely on temporary impacts from construction and ignored long term impacts on air quality. In sections focused on Potential Environmental and Public Health Impacts and Air Quality, they list only “a minor, temporary increase in emissions of some pollutants from the use of equipment” and dust during construction (DEIR at 5-13), with no mention of the risk of long term impacts on air quality and public health from leaks and venting. They entirely omit any mention of the risk of fires and explosions, and what the impact radius and evacuation zones would be from the pipeline, POD station, or Bliss Street Station.

The total emissions from venting and so called “fugitive emissions” were briefly acknowledged in DEIR Section 5.9.2.5, but were omitted and denied in nearly every other section of the report. They estimated a cumulative 74.77 tons per year of greenhouse gas emissions. We expect that the actual emissions from venting will be higher, as they failed to list any estimation of the increased emissions from routine venting at the Bliss Street Station, despite the fact that the new facilities at that station would have to facilitate a much steeper drop in pressure from 200 psi to the low pressure gas distribution lines.

Eversource stated that “non-routine venting is expected to be infrequent and associated with maintenance activities” (DEIR at 5-34), but declined to list any estimations of how large those emissions would be, how they are defining “infrequent” or what circumstances would warrant non-routine venting. These are incredibly salient questions when considering the potential impacts and risks that this project would impose on Springfield’s EJ communities.

We expect that this project would increase local air pollution by more than 75 tons per year, increasing levels of methane and other toxic chemicals in the air, including some introduced during fracking. Eversource acknowledges that the neighborhoods in Springfield that the proposed pipeline would pass through meet the existing vulnerable health EJ criteria, according to the MA Department of Public Health EJ Tool, with elevated rates of “heart attack hospitalization, pediatric asthma, emergency department visits, elevated childhood blood lead, and low birth weight” (DEIR at 6-2). It stands to reason that introducing more chemicals and pollution in Springfield’s air will worsen the air quality and respiratory health crisis that we already face due to the disproportionate effects of polluting projects and facilities sited in Springfield, facilities which Eversource acknowledges in Section 6.0 of the DEIR.

Eversource tries to skirt around the issue of “disproportionate adverse effects” on an EJ community, another criteria set by the Secretary, by claiming that, because the project is geographically evenly split between Springfield and Longmeadow, there would be no disproportionate adverse effects. This ignores the reality that Springfield is already bearing the burden of a disproportionate number of polluting facilities, leading to worsened air quality and high rates of illness. Adding the pollution from pipeline leaks and additional venting at the Bliss Street Station would worsen the disproportionate impact that Springfield already struggles under.

## **Bliss St. Station**

### **The false promise of reliability**

The entire justification for this project is to improve Springfield's energy reliability by creating "a second, independent source of gas" and eliminating the Memorial Bridge and the Agawam Gate Station as single points of failure for the Springfield service area's gas supply. Both aspects of this justification are based upon fallacies, falsehoods, and misdirection.

The new proposed pipeline would not supply Springfield with a second, independent gas supply because the gas supply of the new proposed pipeline and the existing pipeline would be the same: the Tennessee Gas Pipeline ("TGP"). If there were an interruption or failure of the TGP upstream from where the Agawam Gate Station taps into it, all of Springfield, as well as much of the surrounding area, would lose our gas supply.

In order to justify this proposed project, Eversource has been doing a lot of fear mongering about the perceived vulnerability of the existing pipeline that crosses the Connecticut River into Springfield via the Memorial Bridge. Eversource's messaging has been focused on the scenario of some unnamed catastrophe striking the Memorial Bridge and wiping out Springfield's gas supply. That pipeline has been in that same location under the Memorial Bridge for the 70 years of its existence, without ever experiencing such a disaster.

However, even if the proposed project were built, Springfield's energy reliability would not meaningfully improve, because our gas supply would still have a single point of failure (aside from the TGP itself): the Bliss Street Regulator Station. Both the old pipeline and the new one would terminate at the Bliss Street Station, where the pressure of the gas would be reduced before being fed into the low pressure distribution pipes, which would then carry it out to the gas customers in the Springfield service area.

### **Vulnerabilities of the Bliss Street Station**

The Bliss Street Station is not in a good location to serve as the single point of failure for Springfield's gas supply. The station is bracketed on one side by Hall of Fame Ave, a high speed roadway that cars often go speeding down at 60+ mph, less than 30 feet from the station's facilities. If a car were to lose control and crash, it could easily jump the curb and break through the facility's chain link fence to damage the facility, or cause and then ignite a gas explosion.

Bliss Street Station is bracketed on the other side by a railroad track, approximately 20 feet from the station. A passing train could offer the spark to ignite a gas leak from the station. A derailed train would be even more catastrophic, as it would have the force to completely destroy the

facility. Unfortunately, this scenario is much easier to imagine after the catastrophic train derailment in East Palestine, Ohio in February, 2023<sup>1</sup>. Train derailments are not particularly uncommon; according to the Department of Transportation's Federal Railroad Administration, there were an average of 1,474 train derailments annually between 2005 and 2021<sup>2</sup>.

A fire or explosion at the Bliss Street Station would likely damage 1-91. Riverfront Park and the playground there, and the Connecticut River Walk and Bikeway would likely also be in the blast radius. Symphony Hall, City Hall, the Springfield District Court, and the MGM Casino, along with other buildings in the center of Springfield could be damaged by the shock wave from a gas explosion fed by such high pressure pipelines.

For Springfield residents, a large gas explosion is a relatively recent experience. In November of 2012, a gas leak became a disaster when a Columbia Gas company worker breached a distribution pipe with a metal tool, creating a spark and triggering an explosion that injured 18 people<sup>3</sup>, leveled a multi-story building, damaged 42 more buildings, and shattered windows in a 3 block radius<sup>4</sup>, all from a low pressure distribution line. For Springfield residents, it is easier to imagine a gas explosion in our city than a disaster that could seriously damage or destroy the Memorial Bridge.

We find it notable that the actual distances between the Station, Hall of Fame Ave, and the railroad were not included in the DEIR. Eversource's virtual site tour video also obfuscates these distances, as it only shows the Bliss Street Station for a second, from a distance and in relatively low resolution.

In the DEIR, Eversource wrote, "Without the Project, 58,000 customers in the Eversource system would be entirely dependent on the flow from the Agawam Gate Station" (DEIR at 3-1). We invite a reframing of that sentence. *With the project, 58,000 customers in the Eversource system would be entirely dependent on the flow from the Bliss Street Regulator Station (also the Tennessee Gas Pipeline).*

Eversource is justifying this project based on an unlikely worst case scenario, that something would compromise the pipeline on the Memorial Bridge but not the Bliss Street Station. However when assessing the potential risks and impacts of the project, they consider only the best case scenario, to the extent that they do not include the long term risk of leaks, fires, and explosions in their sections focused on potential risks and negative impacts from the project.

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<sup>1</sup> "As Norfolks Southern Faces NTSB Investigation, Train Derailments Are More Common Than You Might Think", March 7, 2023, TIME, available at <https://time.com/6260906/train-derailments-how-common/>

<sup>2</sup> U.S. Department of Transportation, Federal Railroad Administration, Office of Safety Analysis, *Train Accidents by Type and Major Cause from Form FRA F 6180.54*, table 3.16, Accident Summary Tables, available at <http://safetydata.fra.dot.gov/OfficeofSafety/> as of Mar. 3, 2023.

<sup>3</sup> 'Human Error' Caused Springfield Gas Explosion. Nov 26, 2012. WBUR, available at <https://www.wbur.org/news/2012/11/25/springfield-explosion>

<sup>4</sup> "Springfield gas explosion injures at least 18, officials call no loss of life 'a miracle on Worthington Street'" November 24, 2012, MassLive [https://www.masslive.com/news/2012/11/springfield\\_gas\\_explosion\\_inju.html](https://www.masslive.com/news/2012/11/springfield_gas_explosion_inju.html)

Given the statistics for the frequency of gas leaks (pending citation), we find this approach to the project and contents of the DEIR irresponsible at best and deliberately deceitful at worst.

The DEIR notes the potential risk of earthquakes and flooding, both of which would put the Bliss Street Station at risk. An earthquake could crack a pipe, break a weld, or damage the underground parts of the Bliss Street facilities, causing a leak that could become a fire or explosion.

They cite the RMAI Climate Design Standards Tool Project Report, which lists the Bliss Street Station as at moderate risk for extreme precipitation urban flooding and at high risk for extreme precipitation riverine flooding. Eversource follows this with a comment about how there is no precedent in the last 100 years for a flood of that magnitude. However, we are living in unprecedented times, with the climate crisis already changing weather patterns, and with a prospect for increasingly severe and frequent natural disasters. We cannot rely on the comfort of precedent. In our estimation, the Bliss Street Station will be at increasing risk for a flood of that scale as we move further into the climate crisis.

## **Emissions**

In the report, Eversource claims that there would be no venting or new emissions from the additions to the Bliss Street Station. We believe this is not true, given that we know the existing parts of the facility vent gas. Members of the Springfield Climate Justice Coalition and our allies have smelled gas multiple times when near the station, and Eversource officials have assured us that the station has been inspected and has no leaks. Our understanding of how gas systems work indicates that it would not be safe to operate a facility that lowers the high pressure of the incoming gas from 200 psi to down to low pressure gas distribution lines without having the capacity to vent excess pressure. Therefore, we anticipate that there will be emissions from vented gas from the new facilities at the Bliss Street Station. We request that Eversource be required to name their estimated emissions from venting at the Bliss Street Station in a supplemental report.

When discussing the Nature and Severity of Project Impact in Section 6.3.1, Eversource claims that there are no sensitive receptors in the area. We challenge that claim, given that Riverfront Park is a popular community space with a playground. We believe that an area where children frequently play, approximately 500 feet from the Bliss Street Station should be considered a sensitive receptor. Eversource also claims that they anticipate no impact on Riverfront Park from this project, seemingly citing the railroad as a barrier that meaningfully separates the park from the station. We challenge this claim as well, because the emissions from venting and leaks will drift across the tracks to increase the level of air pollution at Riverfront Park.



## **Cost**

Given that the Bliss Street Station and the Tennessee Gas Pipeline 200Line would remain single points of failure for the entire gas supply of the Springfield service area, we assert that this project would not improve Springfield's energy reliability, and question whether this is the best use of \$65 million dollars of Eversource gas ratepayer money. In DEIR Section 2.2.1.2, they make the claim that this project will reduce maintenance costs. We question this claim, given that there will be new facilities at the beginning and end of the pipeline to maintain, along with the 5.3 mile pipeline itself. We do not believe that this project would provide the best reliability at the lowest cost to the ratepayer, particularly given that it is essentially a contingency for an extremely low probability event (the destruction of Memorial Bridge or Agawam Gate Station), and would be further investing in a greenhouse gas emitting system that the Commonwealth has committed to transitioning away from over the next 27 years.

## **Public Health**

The Secretary's Certificate at 14 stated "The DEIR should include a separate section on 'Public Health,' and any known or reasonably foreseeable public health consequences that may result from the environmental impacts of the project. Particular focus should be given to any impacts that may materially exacerbate "vulnerable health EJ criteria," such as the high asthma rates in Springfield noted by many commenters, in accordance with the MEPA Interim Protocol for Analysis of EJ Impacts."

Twice in the last five years, Springfield has been ranked as the geographic area most affected by asthma in the United States. In 2019, the Asthma and Allergy Foundation of America ranked the United States cities with the greatest asthma challenges.

Three Massachusetts cities were in the top tier: Springfield (1st), Boston (8th), and Worcester (30th).<sup>5</sup> In addition, asthma in Massachusetts disproportionately affects Black and Hispanic children and children from low-income families.<sup>6</sup>

In the DEIR at 6-5, Eversource asserts that "Regarding the Bliss Street Regulator Station modifications, this facility has no emissions...As these emissions are minimal, diffuse and disperse immediately, they will not impact the health of people living in Springfield." Regulator stations have standard operating procedures for venting, therefore, there **are** emissions from regulator stations. Given this standard practice and that unanticipated events occur that require venting as well, it is clear that regulator stations give off emissions thus contributing to air

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<sup>5</sup> Asthma and Allergy Foundation of America. Asthma capitals 2019: The most challenging places to live with asthma. <https://www.aafa.org/media/2426/aafa-2019-asthma-capitals-report.pdf>

<sup>6</sup> Massachusetts Department of Public Health. Prevalence of asthma in adults and children in Massachusetts. <https://www.mass.gov/files/documents/2018/05/09/burden-in-mass.pdf>

pollution. And it is clear that doubling the input pipelines to the station will increase its emissions.

The Secretary's Certificate at 15 stated, in the section on Climate Change, "Governor Baker's Executive Order 569: Establishing an Integrated Climate Change Strategy for the Commonwealth was issued on September 16, 2016. The Order recognizes the serious threat presented by climate change and direct(s) Executive Branch agencies to develop and implement an integrated strategy that leverages state resources to combat climate change and prepare for its impacts. The urgent need to address climate change was again recognized by Governor Baker and the Massachusetts Legislature with the recent passage of St. 2021, c. 8, An Act Creating a Next Generation Roadmap for Massachusetts Climate Policy, which sets a goal of Net Zero emissions by 2050."

The DEIR should also include an analysis of the project's impacts to determine whether the project may result in disproportionate adverse effects, or increase the risks of climate change, on the identified EJ populations, in accordance with 301 CMR 11.07(6)(n)(2) and the MEPA Interim Protocol for Analysis of EJ Impacts.

We note that the MEPA statute directs all Agencies to consider reasonably foreseeable climate change impacts, including additional greenhouse gas emissions, and effects, such as extreme precipitation events, when issuing permits, licenses and other administrative approvals and decisions. M.G.L. c. 30, § 61.

Springfield, Massachusetts, the United States, and our home planet are facing existential threats from climate change.

The DEIR does not adequately address the linked climate, public health, and environmental justice devastating negative impacts of the proposed project. That analysis should be included in a Supplemental EIR.

In an unprecedented 2021 joint editorial, Call for Emergency Action to Limit Global Temperature Increases, Restore Biodiversity, and Protect Health, 200 health and medical journals, urged world leaders to cut heat-trapping emissions to avoid ". . . **catastrophic harm to health that will be impossible to reverse,**"<sup>7</sup> [emphasis added]

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<sup>7</sup> Atwoli L, Baqui AH, Benfield T, et al. "Call for Emergency Action to Limit Global Temperature Increases, Restore Biodiversity, and Protect Health," New England Journal of Medicine, 2021 Sep 5, available at: <https://www.nejm.org/doi/10.1056/NEJMe2113200>

The editorial also states:

We are united in recognizing that only fundamental and equitable changes to societies will reverse our current trajectory.

The greatest threat to global public health is the continued failure of world leaders to keep the global temperature rise below 1.5° C and to restore nature. Urgent, society-wide changes must be made and will lead to a fairer and healthier world.

The Eversource EIR must address the underlying global threat of climate change as described in the 2021 joint editorials and the contribution of this proposed project to the continued expansion of fossil fuel/methane infrastructure.

In addition to the existential threats of climate change/chaos that will be increased by the proposed project, the project will exacerbate child health and environmental justice problems in Springfield.

The first article in a new series on Fossil-Fuel Pollution and Climate Change in the New England Journal of Medicine described the impacts of fossil-fuel pollution on children's health<sup>8</sup>:

“The combustion of fossil fuels (coal, petroleum [oil], and natural gas) is the major source of both air pollution and the greenhouse-gas emissions driving climate change. The fetus, infant, and child are especially vulnerable to exposure to air pollution and climate change, which are already taking a major toll on the physical and mental health of children.”

The article concludes:

“The data are compelling that the toll on children and pregnant women from fossil-fuel–driven climate change and air pollution is large and growing, affecting immediate and long-term health.”

It is shocking that nowhere in the DEIR is there any meaningful analysis of future escalating climate risks nor is there analysis of the impact on people living in the environmental justice neighborhoods through which this proposed pipeline would be built. DEIR needs to address these fundamental omissions in their future EIR.

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<sup>8</sup> Perera F, Nadeau K. “*Climate Change, Fossil-Fuel Pollution, and Children's Health*,” New England Journal of Medicine, 2022 Jun 16, available at <https://www.nejm.org/doi/full/10.1056/NEJMra2117706>

Eversource asserts, in DEIR section 6.3.1 Nature and Severity of Project Impact, that this project “will not affect the health of the EJ population living in the area.”

As stated in DEIR section 6.3.1 Nature and Severity of Project Impact, “The Department of Health data shows that the EJ area in the vicinity of the Project has:

1. statistically higher rates for heart attack hospitalization, pediatric asthma, emergency department visits, elevated childhood blood lead, and low birth weight, than the state averages;
2. that there are numerous potential sources of pollution in the Springfield area compared to the more rural area of Longmeadow (see Figures 6-3A through 6-3C); and
3. that the EJ area does have some higher air pollutant levels than the state average.

The Project is expected to result in emissions of natural gas from leakage and venting (DEIR Section 5.9.2.5) but these emissions are small and orders of magnitude lower than GHG reporting requirements. As these emissions are minimal, diffuse and disperse immediately, they will not exacerbate these concerns or affect the health of the EJ population living in the area”.

According to the Union Of Concerned Scientists “Natural gas is a fossil fuel... The drilling and extraction of gas from wells and its transportation in pipelines results in the leakage of methane, the primary component of natural gas. Methane is 34 times stronger than CO<sub>2</sub> at trapping heat over a 100-year period and 86 times stronger over 20 years. Studies as well as field and aerial measurements have shown that high rates of methane leakage can be found throughout the natural gas system.”<sup>9</sup>

This indicates that there would be emissions from the proposed gas infrastructure project that would both contribute to the climate crisis and add to air pollution, thus affecting the health of the EJ population in that area.

In addition to the leakage of methane we must consider the emissions from other volatile organic compounds that would contribute to both the climate crisis and to air pollution, thus negatively affecting the health of Environmental Justice populations in an area that is already burdened with excessive air pollution leading to chronic COPD, cancer, asthma and other respiratory diseases. Even small emissions can have cumulative health impacts, particularly on vulnerable communities as noted in the 2023 open letter, titled “Air pollution and health impacts of oil & gas production in the United States”<sup>10</sup>.

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<sup>9</sup> Union of Concerned Scientists, “*Environmental Impacts of Natural Gas*”, available at <https://www.ucsusa.org/resources/environmental-impacts-natural-gas>

<sup>10</sup> Jonathan J Buonocore, et.al., “*Air pollution and health impacts of oil & gas production in the United States*”, *Environmental Research: Health, Volume 1, Number 2, 2023 May 8th*, available at: [Air pollution and health impacts of oil & gas production in the United States - IOPscience](#)

## Unnecessary and incompatible with the Commonwealth's climate plans

### **DEIR does not adequately supplement alternatives analysis**

The Secretary's Certificate at 4 states the "DEIR should supplement the alternatives analysis to further describe alternatives to the project, including non-pipeline alternatives" yet the non-pipeline alternatives described in the DEIR in 3.2.4 are virtually the same as described in the ENF in 2.2.4 save the introduction that Eversource will investigate adding low-carbon or no-carbon gases to their supply. But these gases are not an alternative to the project, just a delay and distraction tactic that doesn't justify the proposed infrastructure expansion.

The geothermal section of the non-pipeline alternatives at DEIR 3-25 remains out of date with the same text from the ENF claiming the Company "is currently in the initial phases of its geothermal pilot and is focused on site selection." The Company's geothermal pilot site selection was done in January 2022<sup>11</sup>, test boreholes drilled in September 2022,<sup>12</sup> and the project is currently under construction<sup>13</sup>.

The Electrification section of Other Non-Pipeline Alternatives at DEIR 3-24 doesn't supplement the analysis; rather it simply claims that continued gas supply is supported by the [Interim] 2030 CECP and the 2050 Roadmap. But those documents don't recommend expanding the gas infrastructure and supply. In fact, the Commission on Clean Heat Final Report of November 2022, which the DEIR completely ignores, states "*[i]nvestments that would support new or increased natural gas infrastructure or capacity should instead be deployed to advance measures that help support the net zero future<sup>14</sup>*" and "*should avoid future investments in gas pipeline infrastructure that will disproportionately burden LMI [low-to-moderate income] households.<sup>15</sup>*" The \$65M proposed project runs counter to the Final Report, especially for the many LMI households of Springfield.

The Electrification section of Other Non-Pipeline Alternatives at DEIR 3-24 as a whole only references the "interim Massachusetts CECP for 2030", no change or further analysis from the

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<sup>11</sup> "VIDEO: Eversource & City of Framingham Partner To Launch Geothermal Network Pilot Project", January 26, 2022, available at <https://framinghamsource.com/index.php/2022/01/26/video-eversource-city-of-framingham-partner-to-launch-geothermal-network-pilot-project/>

<sup>12</sup> "Test boreholes were drilled at three locations along the pilot route in September", Eversource Geothermal Pilot Project in Framingham, available at <https://www.eversource.com/content/residential/about/transmission-distribution/projects/massachusetts-projects/geothermal-pilot-project>

<sup>13</sup> Id

<sup>14</sup> Final Report Massachusetts Commission on Clean Heat ("Final Report of MCCH"), November 30, 2022, at 20, available at: <https://www.mass.gov/doc/massachusetts-commission-on-clean-heat-final-report-november-30-2022/download>

<sup>15</sup> Id at 16

ENF, so has not been updated nor taken into account the more recent CECP for 2025 and 2030 and the Commission on Clean Heat Final Report that put electrification as “*the Commonwealth’s dominant building decarbonization strategy*.”<sup>16</sup>

The DEIR fails to supplement the alternatives analysis in any substantive way to further describe alternatives to the proposed project as instructed in the Certificate therefore that analysis must be provided in a Supplemental DEIR.

### **DEIR does not adequately evaluate other options nor describe condition of existing infrastructure**

The ENF and DEIR at 2-5 both describe the “aging condition” of the existing infrastructure between the TGP pipeline in Agawam and the Bliss Street Regulator Station and give that as partial reason for project need. But neither document discloses that the 8,500’ of pipe from the TGP pipeline in Agawam through West Springfield and up to the Memorial Bridge has just been replaced. The “ConEd Replacement” project proposed by Columbia Gas in 2017 was permitted in February 2021<sup>17</sup> by Eversource as the “Agawam-West Springfield Natural Gas Pipeline Replacement Project” with construction completed in 2022 having started in March<sup>18</sup>. Only the Springfield section of the pipeline on the Memorial Bridge over the Connecticut River on to the Bliss St. regulator is “in aging condition.” The Springfield City Council has repeatedly asked Eversource representatives if that section is at risk. The answer from Eversource has repeatedly been “No”<sup>19</sup>.

The Certificate at 7 instructed review of whether “the proposed project would improve reliability if the Bliss Street Regulator Station were to fail.” The DEIR at 9-4 states “This project does not increase the reliability of the existing Bliss St. Regulator Station.” Here, Eversource admits the proposed project does not increase that reliability. It leaves the Bliss St. Regulator Station as a single point of failure for the City of Springfield regardless of whether this project is allowed to move forward or not. No options in combination were presented in the DEIR that could address

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<sup>16</sup> Massachusetts Clean Energy and Climate Plan for 2025 and 2030, June 30, 2022, at 27, available at: <https://www.mass.gov/doc/clean-energy-and-climate-plan-for-2025-and-2030/download>

<sup>17</sup> West Springfield Conservation Commission meeting of February 24, 2021, Eversource Request for Determination of Applicability starts at 43:35, available at [https://www.facebook.com/watch/live/?ref=watch\\_permalink&v=508039737264312](https://www.facebook.com/watch/live/?ref=watch_permalink&v=508039737264312); Eversource Request for Determination of Applicability heard and issued at the Agawam Conservation Commission held the next night of February 25, 2021, Meeting Minutes available at [https://www.agawam.ma.us/AgendaCenter/ViewFile/Minutes/\\_02252021-1296](https://www.agawam.ma.us/AgendaCenter/ViewFile/Minutes/_02252021-1296).

<sup>18</sup> Town of West Springfield notification, “Eversource gas will be replacing 1.2 miles of gas pipeline, from the Morgan Sullivan Bridge to Union Street Extension . Work begins March of 2022 and will end in fall of 2022” available at

<https://www.townofwestspringfield.org/Business/Public-Works/ROLLED-BACK-Projects/Memorial-Avenue>

<sup>19</sup> Eversource Public Hearing at #:# available at <http://>

reliability without the proposed expansion project. Therefore there is insufficient analysis in the DEIR describing options to avoid a new fully redundant supply.

### **DEIR fails to dispel likelihood project is to aid adding customers**

The Secretary's Certificate at 17 directed the Company to explain whether the new gas infrastructure proposed by the project could result in adding customers. The Company's latest Long Range Forecast and Supply Plan ("FSP"), filed in 2021 and approved in 2022, in DPU Docket 21-118, forecasts adding 10,000+ residential heating customers<sup>20</sup>, 2,500 of which are in the Springfield division. Needless to say, expanding the customer base is a reason for increasing the capacity to supply gas to the City of Springfield whether there has been an expanded gas contract sought yet or not. New gas customers investing in new gas appliances that will have a service life beyond the 2050 timeline in which we need to be at net zero runs counter to the Commonwealth's climate plans. And counter to our mandate to reach net zero by 2050. And no help to reaching 2030 benchmarks. Additionally the project's new infrastructure at its station endpoints - one new large meter station (the "POD") and one existing regulator station expanded to take input from a large 200 psi main - will by standard operating procedure, and by unanticipated events, be venting additional emissions at both ends. The DEIR claim at 2-13 that the Company's latest FSP is their 2019 submission (DPU19-135) is out of date.

The DEIR states at 2-8 that "It is important to note that, as a result of this Project, there will be no net supply increase to the area. Eversource's ability to receive additional units of natural gas is capped by the Department of Public Utilities' approval of long-term supply contracts, which are not a component of this Project." But what is to stop the Company from going to the Department for increased supply now that it has the infrastructure to carry it? Nothing. The long standing practice of the gas companies is to forecast new customers, and then contract for more gas and build new infrastructure to carry it, in whichever order. The Company is already looking at "securing lower carbon or no carbon gases that can be blended with natural gas" DEIR at 2-8. Either getting increased gas contracts so infrastructure must be built to carry it, or adding infrastructure so increased gas contracts to fill the added capacity are century old practices that are now incompatible with the Commonwealth's required transition off gas. Simply saying "no net supply increase" will result from this expansion project, only one piece of the Company's plans, does not address the reality of the gas industry.

The DEIR claims at 2-7 that suddenly Tennessee Gas Pipeline presented the Longmeadow meter station to the Company as a "new opportunity" to address reliability runs counter to the fact that the Longmeadow meter station at the Longmeadow Country Club on Hazardville Road has long been part of the expansion plans to bring more gas capacity to the City of Springfield. The new POD at the same location was proposed at least a decade ago as part of the Kinder Morgan

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<sup>20</sup> Eversource Gas Company of Massachusetts, 2021/2022 – 2025/2026 Forecast and Supply Plan, at 27 of 102 available at <https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/14152319>

Northeast Energy Direct project<sup>21</sup>. The old gas industry plans of seeking every opportunity for ever expanding gas capacity runs counter to the new realities of climate change and emission reduction mandates. Other solutions to address the reliability need that do not include expanding gas infrastructure, rather a planned orderly decommissioning of the system, must be analyzed and found.

The Company's plans, considered in their entirety, not siloed by individual projects and departments must be analyzed. The DEIR fails to justify the need, only describes the Company's desire to continue business-as-usual practices. Further analysis that finds a solution without the proposed expansion project, its negative environmental impacts and its \$65M price tag for ratepayers is required. That analysis should be included in a Supplemental EIR.

### **Conclusion**

The Springfield Climate Justice Coalition appreciates this opportunity to provide comments on the Draft EIR. We believe the analysis it contains is inadequate for the gas expansion project as proposed. All analysis required by the Secretary's Certificate must be provided. The determination must be made that the Draft Environmental Impact Report submitted does not adequately and properly comply with MEPA and its implementing regulations, and therefore requires the filing of a Supplemental DEIR. Please do not hesitate to contact us if you have any questions or require more information on any comment we've provided.

Signed,

Comment drafters

Naia Tenerowicz

Susan Theberge

Cathy Kristofferson

**Springfield Climate Justice  
Coalition (SCJC)**

**Climate Action Now  
Western MA (CAN)**

**Pipe Line Awareness Network  
for the Northeast (PLAN)**

Additional signatories, organization,

(add alphabetized endorsers here)

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<sup>21</sup> Kinder Morgan plans pipeline metering station in Longmeadow, March 16, 2015, MassLive, "*Tennessee Gas Pipeline Co. plans to build a new metering station on land near the Longmeadow Country Club, according to maps included with an environmental report released by the energy company Friday.*", available at [https://www.masslive.com/news/2015/03/kinder\\_morgan\\_plans\\_pipeline\\_m.html](https://www.masslive.com/news/2015/03/kinder_morgan_plans_pipeline_m.html) ; "*The two proposed meter stations in Longmeadow and West Greenfield were both stipulated in Kinder Morgan's December 2014 filing () on page 1-31 of Resource Report 1, Volume I*", available in NED\_METERS\_FILE\_03\_2014\_11\_26.PDF 7 of 14 [https://elibrary.ferc.gov/eLibrary/idmws/file\\_list.asp?accession\\_num=20141208-5217](https://elibrary.ferc.gov/eLibrary/idmws/file_list.asp?accession_num=20141208-5217).