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October 4, 2024

Via email: alexander.strysky@mass.gov

Massachusetts Environmental Policy Act Office
Attn: Mr. Alex Strysky, Environmental Analyst
100 Cambridge Street
Boston, MA 02114

Re: *Everett Docklands Innovation District & Trimount Energy Storage Facility EENF*

Dear Mr. Strysky,

Boston Harbor Now respectfully submits the following comments on the Everett Docklands Innovation District & Trimount Energy Storage Facility Expanded Environmental Notification Form (EENF) submitted by the Everett Landco and Trimount ESS.

Boston Harbor Now advocates for climate resiliency measures that contribute to district-scale flood protection and improve ecosystem services while activating the waterfront by facilitating public programming, ensuring equitable access, and supporting the regional economy. We are a long-time champion of working waterfronts, with their unique requirements for deep water access and specialized jobs, and are committed to ensuring that the waterfront we build today is designed for a more resilient and inclusive future. We envision that Designated Port Areas (DPAs) will support the existing and future marine industries that strengthen our region and prepare for the challenges climate change will bring. We expect robust port areas to work with their neighboring communities and provide residents with jobs, educational opportunities, and public access where safe and appropriate that allow both to flourish.

Our organization met with the proponent regarding their project, and most recently, staff attended the September 17, 2024 site visit and subsequent hybrid meeting, and a discussion of the project organized by Kate Harson, Environmental Justice Liaison for the Massachusetts Environmental Policy Act Office. We appreciate this opportunity to provide comments.

The Designated Port Area

According to the EENF, the Phase 1 Project proposes to build a Battery Energy Storage System (BESS), “two on-site open-air substations, two small buildings for personnel and equipment storage totaling 5,800 sf, and a generation interconnect (Gen-Tie) line that will link the facility to the Eversource Substation 250...” The wind-generated clean energy will be delivered to the BESS via “undersea transmission cables making landfall in the immediate vicinity of the BESS and in close proximity to the Mystic Substation and Gen-Tie Line Interconnection” according to the Department of Environmental Protection’s Determination of Applicability – 310 CRM 9.00. This new infrastructure will enable the use of offshore wind-generated power by “store[ing] electric power to be produced by an anticipated offshore wind project to be located off the Massachusetts coast.”

While we are supportive of the creation of the BESS, which will aid the Commonwealth’s transition to clean energy, we are unsure whether this is a water-dependent use. It is not clear how important it is to locate the batteries and other energy-related uses as close to where the power comes ashore as possible. If this is



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important, it should be explained in the proposal. Regardless of whether a BESS is a truly water-dependent use, we believe it is an important enough industrial use to warrant the occupation of the 0.53 acres of private tidelands within a DPA. We understand the urgency of clean energy development and recognize that the 0.53 acres of private tidelands within the DPA are part of a larger vision for the 20.7 acres of land intended for BESS usage. We also think that the offshore wind energy industry is an important 21st-century maritime industry. Given the importance of this project, we support the waiver for Phase 1.

Preparing for Climate Change Impacts

With Phase 1 containing critical infrastructure, including two on-site open-air substations, Boston Harbor Now wants to ensure that Phase 1 infrastructure will remain dry even in the most extreme circumstances in the future. Although the EENF states that “Phase 1 Project Site is elevated above the 2070 1% ACE flood. Critical project elements will be elevated on pads above the 2070 0.5% ACE...” and “The Phase 1 Project Site is within the area that would be protected from flooding” with the installation of the Island End River Flood Resiliency Project, we are concerned about the low elevation of the project site given the significance of the infrastructure and longer life span affiliated with the infrastructure. Should the timing of this project precede the Island End River Flood Resiliency Project, this site will be exposed to a major flood pathway that could damage critical infrastructure. Additionally, during the September 17, 2024 site visit and subsequent hybrid meeting, attendees raised concerns about flanking flood waters from the Mystic River, further highlighting the vulnerability of this site.

To understand how vulnerable the site is to coastal flooding, we hope to receive additional data and clarity on the expected life of the BESS and substations. If the design life extends beyond the Massachusetts Coast Flood Risk Model (through 2070), then Boston Harbor Now would like to see the proponent further elevate Parcel A of their Phase 1 site, which will be “remediated and graded to ... elevation 14 NAVD88”. We also recommend constructing the project in such a manner that allows for the construction of additional flood infrastructure should flooding become more extreme. For example, the pads, which “(c)ritical project elements will be elevated on..” should be designed to withstand coastal inundation just as the project elements are being designed with “redundant waterproofing.” We also request the proponent to delve further into the concern about flanking from the Mystic River and ensure that the timing of their project is coordinated with the delivery of the Island End River Project.

Beyond Phase 1

Phase 1 is just part of the larger Masterplan intended for this area. With “approximately 400,000 SF of industrial space, 400,000 SF of high-tech manufacturing space, 3,300,000 SF of lab/office space, 240,000 SF of retail space, 36,000 SF of maker space, and 2,815,000 SF of residential space (approximately 3,200 residential units) with ancillary roadways, parking and open space” coming to Everett, we hope to see the proponent actively engage with the local community. New development at this scale has the potential to bring exciting new community amenities along with detrimental impacts, and the community needs to have a say in all aspects of the master plan.

We anticipate a significant increase in traffic for this area, especially with other developments proposed nearby. If any additional new projects come to this area,



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they should work with local and state officials along with the Everett Docklands proponent to create a holistic transportation mitigation plan. Mitigation for traffic impacts for Everett Docklands Masterplan might include the development or support of other modes of public transit. Should water transportation be pursued by other projects along the waterfront, we suggest that connecting landside public transit also be developed by this project, or others, to allow water transportation users to easily travel further inland.

In addition to the area outlined in the Masterplan, the proponents also own a docking area along the Mystic River. According to the proponent, this site is not contemplated as a part of this project because they do not currently have a specified use for it. Should the proponent find a use for the docking area, they stated that it will be added to the proposed Masterplan as a Notice of Project Change. Boston Harbor continues to need new infrastructure to support ferry operations, such as charging for refueling locations for electric or hydrogen ferries and repair facilities, and we welcome the opportunity to meet with the proponent to help identify potential uses for this area.

In conclusion, Boston Harbor Now supports the installation of the BESS, substations, and other proposed infrastructure to integrate clean wind energy into the grid if proximity to the cables is required. Though we are pleased to see this site being used for clean energy purposes, we hope the proponent will address the concerns about coastal flood resilience. The infrastructure proposed here will be critical and long-lasting, making its protection from climate impacts even more imperative. Phase 1 is just the kickoff to this Masterplan. Subsequent phases will have a tremendous impact to the local community and regional transportation network. We expect the proponent to engage community members and work to not only mitigate their impacts but also create a development that brings vital amenities to the surrounding communities. Although not mentioned during this filing, we look forward to following the proponent's plans for the docking area along the Mystic. Boston Harbor Now would be happy to discuss the site further with the proponent should they resume their interest in improving the site.

We appreciate the opportunity to comment on this project. Offshore wind will be vital to the Commonwealth's pursuit of decarbonization, and we hope that DPAs play a role and are protected accordingly.

We would be happy to speak with you further if there are additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Abbott".

Kathy Abbott
President and CEO
Boston Harbor Now