July 8, 2021

Governor Charles Baker  
The State House  
24 Beacon Street  
Room 280  
Boston, MA 02133

Dear Governor Baker,

The Peabody Board of Health has recently learned that the “Project 2015A” proposed by the Massachusetts Municipal Wholesale Electric Company to be sited in Peabody has been issued Draft Plan Approval by the MassDEP without having been required to develop an Environmental Impact Report or conduct a comprehensive health impact assessment.

There are many well-documented health concerns associated with fossil fuel-burning power plants. Emissions such as sulfur dioxide, nitrogen dioxide, carbon monoxide, and other hazardous pollutants can contribute to cancer risk, birth defects, and harm to the nervous system and brain. Emissions of particulates increase risk of heart disease, lung cancer, COPD, and asthma. Emission contributions from power plants increase levels of ozone and drive climate change, which can make breathing more difficult, increase allergens and the risk of fungal diseases, and affect health through the disruption of critical infrastructure such as electrical and water and sewer systems.

We have reviewed the MassDEP plan approval, which concludes from its analysis of modeling that pollution emitted by the proposed plant will not exceed National or Massachusetts Ambient Air Quality Standards or the applicable Threshold Exposure Levels. However, we also understand that the plant has the potential to produce an additional 12 tons per year of small particulates; 8.3 tons per year of carbon monoxide; 0.6 tons per year of sulfur dioxide; 1.8 tons per year of ozone; 6.3 tons per year of nitrogen oxides; 0.00025 tons per year of lead; and 50,779 tons per year of carbon dioxide equivalents. The magnitude and risks of these hazards cannot be fully understood without comprehensive health impact assessments and environmental impact reports.

The Board of Health recognizes your commitment to Environmental Justice. The law you signed in March 2021, An Act Creating a Next Generation Roadmap for Massachusetts Climate Policy, expanded Massachusetts Environmental Policy Act (MEPA) review to require an Environmental Impact Report for all projects that impact air quality within one mile of an Environmental Justice Neighborhood. The law also requires DEP to evaluate historic environmental pollution throughout the community in addition to individual project impacts as part of its permitting process. Although this law was not in effect at the time this project was permitted, we believe that these steps are absolutely necessary before this project proceeds.

Draft Air Quality Plan Approval, MassDEP, August 2020
The City of Peabody, the proposed location for this project, has 41.5% of its population living in an Environmental Justice block. The project itself is sited in an environmental justice census block, and the adjacent census blocks to the north, west, south, and southeast are also considered to be environmental justice blocks. In the census block where this plant is proposed, 7.1% of the population live below the poverty level; 28.1% are elders living alone, and 16.5% have one or more disabilities. 20.4% reside in households where English is not the primary language. Such demographics are linked to poorer health status and increased vulnerability to the impact of environmental stressors on health outcomes. It is important to note that this proposed project site is already home to two existing “peaker” plants, meaning that the nearby environmental justice communities are already subject to the environmental and health impacts of those existing power plants.

The Peabody Board of Health requests the following steps be taken to better understand the potential impact of Project 2015A on our community’s health:

1. A full Environmental Impact Report
2. A comprehensive health impact assessment
   a. Define the stakeholder engagement process.
   b. Define the vulnerable populations, both in immediate proximity to the plant and others within the potential zone of air pollution.
   c. Define the baseline health of the vulnerable population.
   d. Evaluate the potential short and long-term impacts of emissions from the plant on human health. This assessment must use evidence-based methods that consider physical, mental, environmental, economic, and social determinants of health.
   e. Identify mitigation measures to prevent or minimize the short- and long-term impacts identified.
   f. Define the environmental monitoring required – substances to be monitored, media to be monitored (soil, water, air), timeframes for monitoring, and qualifications for those conducting the monitoring (including whether monitoring is to be conducted internally or by an independent evaluator, or both).
   g. Define the health metrics and monitoring required to evaluate the health impacts of the project.
   h. Define obligations for reporting data to the community.
   i. Define mechanisms for health or environmental concerns of residents to be addressed throughout the life of the project.

The Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs calls for “meaningful involvement” of affected persons and communities, as well as the “equitable distribution of

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2. [https://www.mass.gov/info-details/environmental-justice-populations-in-massachusetts](https://www.mass.gov/info-details/environmental-justice-populations-in-massachusetts) Of the other 13 communities benefitting from this project, 9 have EJ populations lower than in Peabody.

3. Massachusetts Environmental Public Health Tracking Community Profile and Office of Preparedness and Emergency Management Census Tract Profile. [https://matracking.ehs.state.ma.us/](https://matracking.ehs.state.ma.us/)

4. [https://matracking.ehs.state.ma.us/planning_and_tools/hia/index.html](https://matracking.ehs.state.ma.us/planning_and_tools/hia/index.html)
energy and environmental benefits and burdens.”

We understand the benefits of this proposed plant in terms of ensuring adequate energy capacity in the region, with stable and known costs. However, we believe that it is impossible to understand the potential burdens of this project, particularly on vulnerable and disproportionately-impacted residents, without a full Environmental Impact Report and comprehensive health impact assessment.

Thank you for your support and concern for the health, safety, and well-being of the residents of the Commonwealth.

Sincerely on behalf of the Peabody Board of Health,

Dr. Leigh Ann Mansberger, M.D., M.P.H.

Sharon Cameron, Director of Health

Cc: Margret Cooke, Acting Commissioner, Massachusetts Department of Public Health
Martin Suuberg, Commissioner, Massachusetts Department of Environmental Protection
Tori Kim, Director, Massachusetts Environmental Policy Act Office
Edward Bettencourt, Mayor, City of Peabody
Thomas D’Amato, Chairperson, Peabody Municipal Light Plant