



**THE COMMONWEALTH OF MASSACHUSETTS  
ENERGY FACILITIES SITING BOARD**

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July 24, 2015

**BY ELECTRONIC FILING**

Ms. Kimberly Bose, Secretary  
Federal Regulatory Energy Commission  
888 First Street, NE  
Washington, DC 20426

Re: Algonquin Gas Transmission, L.L.C., PF15-12-000

Dear Ms. Bose:

The Massachusetts Energy Facilities Siting Board (“Siting Board” or “EFSB”) hereby submits comments on the draft Resource Reports that Algonquin Gas Transmission, LLC (“Algonquin”) filed with the Federal Energy Regulatory Commission (“FERC”) regarding the Atlantic Bridge project (“Project”), FERC proceeding PF15-12-000. These comments are limited to the Massachusetts portion of the Project, that is, a 10,915 horsepower (“hp”) compressor station proposed in Weymouth.

**I. INTRODUCTION**

On June 18 and June 22, 2015, the Siting Board submitted comments to FERC based on its review of pre-filing materials, FERC scoping meetings, a site visit, a Siting Board public comment hearing, and written public comments. The letters outlined the public feedback and environmental and procedural issues identified by the Siting Board. There are several outstanding issues in the previously submitted comment letters which were not addressed in the draft Resource Reports. Specifically, in addition to those issues detailed below, the draft Resource Reports do not adequately address the cumulative impacts of the compressor station in the Fore River Basin, an area with extensive industrial infrastructure. The Siting Board requests that the Company reference the earlier comments of the Board in addition to these when preparing the Application for the Project.

On June 25, 2015, the Company submitted responses to stakeholder scoping comments received during the FERC scoping period, which ended on June 11, 2015. On July 1, 2015, the Company submitted draft Resource Reports one through twelve. The Siting Board would like to

highlight several outstanding concerns below that should be addressed in the Draft Environmental Assessment (“EA”) (and/or Environmental Impact Statement, if so required) and in the Project Application filing.

The Siting Board is an independent board of the Commonwealth of Massachusetts with a statutory mission to ensure a “reliable energy supply for the Commonwealth with a minimum impact on the environment at the lowest possible cost.” G.L. c. 164, § 69H. The Siting Board is required by regulation at 980 C.M.R. § 7.07(9)(a) to conduct public information hearings and intervene at FERC to preserve the rights of interested citizens of the Commonwealth when an interstate natural gas pipeline company applies to FERC to construct or modify pipeline facilities within Massachusetts. The Siting Board participates in the pre-filing phase of FERC proceedings in order fulfill this regulatory obligation.

## II. COMMENTS ON ALGONQUIN’S DRAFT RESOURCE REPORTS

Pursuant to FERC regulations, Algonquin has filed twelve draft Resource Reports in this proceeding along with supporting data. This letter includes the Siting Board’s comments on the draft Resource Reports (organized by resource report topic). As review of the Project continues, the Siting Board intends to submit supplemental comments as necessary.

### A. Resource Report 1: General

The Company has provided information to the Siting Board and Weymouth officials on the potential for two additional compressor units to be proposed on the same parcel as the Weymouth compressor station in the Atlantic Bridge Project as part of the Company’s Access Northeast Project (“ANE”). The Company also informed agency stakeholders on a July 14, 2015 bi-weekly call that a factsheet comparing the Atlantic Bridge and ANE projects would be mailed to affected landowners in the Weymouth area in the coming weeks. The Company states in Resource Report 1 at 1-46 that “specific details concerning the elements of a potential future ANE Project have not yet been developed and as a result potential environmental effects relating to the ANE Project are not currently reasonably foreseeable.” Since the Company has begun public outreach for the ANE Project, and ANE Project details seem to be falling into place, the Siting Board requests that the Company assess the cumulative environmental, public health, and safety impacts of the Project and ANE in the Draft EA and in the Project Application filing for Atlantic Bridge.<sup>1</sup>

A general site plan for the Weymouth compressor station is presented in Volume II. The Project application should include a discussion as well as an overlay to WEYM-G-1022 and/or a photo representation detailing where the two additional compressor units associated with ANE could be situated on the site.

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<sup>1</sup> The Company informed the Siting Board that it intends to pre-file the ANE Project with FERC in November.

B. Resource Report 8: Land Use/Recreation/Aesthetics

The Weymouth compressor station will be located in a Commonwealth of Massachusetts Designated Port Area (“DPA”). The Company should provide information regarding how the Project will comply with a Department of Environmental Protection (“MassDEP”) Chapter 91 waterways license, which limits the placement of fill or structures in DPAs to water-dependent industrial uses. The Company should also address public access in this area as required by Chapter 91.

C. Resource Report 9: Air and Noise

*Air*

The Company indicates in Resource Report 9 that further information about the existing and new air emissions sources and detailed emissions calculations will be included in Appendix 9A, that will accompany Algonquin’s FERC application in September 2015. The Siting Board will review Appendix 9A when it is filed for the detailed emissions calculations for the Weymouth compressor station. As discussed above, the Siting Board notes the importance of the analysis including cumulative air impacts. (Also see page 10 of the EFSB June 18 Comment Letter).

*Noise*

- The Company’s background nighttime levels were based on measurements conducted between 10:00 p.m. to 11:00 p.m. (see Appendix 9G, Weymouth at 13). The Company should reevaluate the background nighttime measurements using the hours between 12:00 a.m. and 4:00 a.m., which has been recommended by the MassDEP as the most typical quiet hours. See EFSB 12-2 at 60, n.56. Additionally, the Fore River Bridge Replacement Project can currently run up to three shifts, for a maximum of 24 hours-a-day.<sup>2</sup> If the November 18, 2014 noise analysis was completed on a day that the Fore River Bridge Replacement Project was working a double shift (7:00 a.m. to 11:00 p.m.), the construction noise from this Project would have contributed to the background ambient noise level. The Company should ensure that the Fore River Bridge Replacement Project is not working three shifts on the day that it completes the noise analysis.
- The Siting Board’s June 18 letter recommended eight receptor locations for the noise analysis. The draft resource reports modeled operational noise measurements for three noise-sensitive areas (“NSA”), which correspond with three of the EFSB proposed receptors. The Board requests that the Company expand the noise analysis to include the additional five receptors.

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<sup>2</sup> The three shifts are: 7:00 a.m. to 3:00 p.m., 3:00 p.m. to 11:00 p.m., and 11:00 p.m. to 7:00 a.m. See <http://www.massdotprojectsforeriverbridge.info/projtime.html>.

- Appendix 9G, “Weymouth Compressor Station, Results of an Ambient Site Sound Survey and Acoustical Analysis of the New Natural Gas Compressor Station Associated with the Proposed Atlantic Bridge Project”, at 19 states that an estimated attenuation of two decibels was included due to foliage and topography. Further, on page 20, it is stated that “since there will a substantial amount of trees between the Station and NSAs, the sound attenuation effect of foliage was included”. The three NSAs that the Company used for this analysis do not appear to be shielded from the station by a substantial amount of trees and, therefore, this attenuation should not be included for the analysis.
- Many commenters addressed concerns about sound dispersion over water, specifically residences in Weymouth located across Kings Cove and in Quincy across the Weymouth Fore River. The noise analysis included modeling of noise levels at NSAs in those areas, but did not discuss the impact of noise traveling over water. The Company should include a discussion and analysis of noise dispersion over water on NSAs #2 and #3.
- The noise analysis presented in Appendix 9G refers to an analysis associated with blowdowns as well as construction noise. Neither topic appears to be addressed in Resource Report 9 and therefore should be included in the Application.
- According to Table C, page 14 in Appendix 9G, the proposed Weymouth compressor station exceeds the MassDEP noise guideline for pure tone noise condition at NSA #1.. The Company should address how it would mitigate this noise impact.

Therefore, the revised noise analysis should: (1) use background  $L_{90}$  levels that are measured between the hours of 12:00 a.m. to 4:00 a.m.; (2) use background  $L_{90}$  levels that are measured when there is no construction occurring for the Fore River Bridge Replacement Project; (3) delete the use of the two decibel attenuation; (4) include the five additional receptors recommended by the EFSB in its June 18 letter; and (5) include the affects of noise dispersion over water for NSAs #2 and #3.

#### D. Resource Report 10: Alternatives

The June 18 letter from the EFSB contained the request for a detailed analysis and consideration of alternative locations for the compressor station. Resource Report 10 identifies three alternative sites in Weymouth. The analysis does not address in detail the ability to be located outside of Weymouth, nor whether with the reconfiguration of the size of Atlantic Bridge Project, and/or the proposal for the ANE Project (with new pipeline to be located in Weymouth), the proposed site is still the best site.

#### E. Other

None of the draft Resource Reports addresses the issue of traffic and safety with regard egress and ingress to the site due to its location in the vicinity of the Fore River Bridge. A traffic

analysis should be conducted for both construction and operation of the proposed facility, including emergency access.

Finally, the draft Resource Reports did not address the current ownership and availability of the North Parcel, nor the conditions included in the EFSB Final Decision on the Fore River Energy Center (see page 12 of the EFSB June 18 Letter).

### III. CLOSING COMMENTS

In summary, the Massachusetts Siting Board staff appreciates the opportunity to file comments on the draft Resource Reports for the Algonquin Atlantic Bridge Project, in docket PF15-12-000. The Siting Board will continue to monitor Algonquin's Project submissions to FERC and defer more extensive recommendations until information on the Project is more complete. This would most likely occur in September 2015 with the filing of the Application and/or during the public comment period associated with FERC's preparation of its environmental document.

Sincerely yours,



Robert J. Shea  
Presiding Officer

cc: DeAndra Black, Esq., Algonquin Gas Transmission  
Jon Bonsall, Esq., Keegan Werlin LLP  
Maggie Suter, FERC

Document Content(s)

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