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Attachment D-7: Determination of Public Benefit Chap 91

Pictured: Jupiter's Callisto | BESS in Harris County, TX

Prepared For:

Massachusetts Department of Energy Resources

Electric Distribution Companies:

Fitchburg Gas & Electric Light Company d/b/a Unitil

Massachusetts Electric Company and Nantucket Electric Company,
each d/b/a National Grid

NSTAR Electric Company d/b/a Eversource Energy

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December 23, 2024

PUBLIC BENEFIT DETERMINATION
OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS

PROJECT NAME : Everett Docklands Innovation District and Trimount Energy
Storage Facility – Phase 1
PROJECT MUNICIPALITY : Everett
PROJECT WATERSHED : Boston Harbor
EEA NUMBER : 16867
PROJECT PROPONENT : Everett Landco, LLC and Trimount ESS LLC
DATE NOTICED IN MONITOR : August 23, 2024

Consistent with the provisions of *An Act Relative to Licensing Requirements for Certain Tidelands*, I hereby determine that the above-referenced project will have a public benefit. This Public Benefit Determination (PBD) concerns Phase 1 of a Master Plan (Full Build) project which involves the phased redevelopment of an 86-acre former fossil fuel storage terminal. Phase 1 of the project consists of the construction of an approximately 700-megawatt (MW) battery energy storage system (BESS) on an approximately 20.4-acre portion of the site. I issued a Certificate on an Expanded Environmental Notification Form (EENF) on October 5, 2024, which proposed to grant a Phase 1 Waiver to allow the BESS portion of the project to proceed to permitting ahead of completion of MEPA review for Phase 2 of the Master Plan. The Phase 1 Waiver was granted in a Final Record of Decision issued on November 29, 2024. An updated PBD for the Master Plan project will be issued after completion of MEPA review for Phase 2.

Project Description

As described in the EENF, the Master Plan (Full Build) project involves the phased redevelopment of an 86-acre former fossil fuel storage terminal. Phase 1 includes an energy storage facility on 20.3 acres of the site and a connection to the Eversource 250 substation by two electric

circuits in an underground conduit. The Master Plan (including Phase 1) will include construction of approximately 7.2 million square feet (sf) of residential, commercial and industrial uses over the project site, with Phase 2 involving redevelopment of the 65.6-acre portion of the site outside of the Phase 1 area. The energy storage facility, known as the Trimount Energy Storage Facility, and the rest of the Master Plan project are proposed by different entities on land under the ownership of the Phase 2 Proponent; however, because the energy storage facility is the first phase of a larger Master Plan development plan, the two phases are being reviewed jointly as part of this MEPA review.

The site is currently undergoing remediation pursuant to the Massachusetts Contingency Plan (MCP), M.G.L. c. 21E, including removal of structures formerly used for fossil fuel storage, remediation of soil and groundwater, and placement of fill to cap the site. According to the EENF, remediation activities are not subject to any Agency Actions triggering MEPA review, and, therefore, are proceeding independently of this review. The EENF defines “existing conditions” for the Master Plan development as those anticipated after the placement of fill on the site. According to the EENF, remediation of the site will require placement of approximately 700,000 cubic yards (cy) to fill and cap the site. Upon completion of filling in connection with remediation of the site, elevations will range from approximately 10.5 ft to 10.7 ft NAVD 88 at the northern part of the site to 14 ft to 20.5 ft NAVD 88 adjacent to and south of Beacham Street. As discussed below, these elevations reflect both the minimum requirements to meet public health standards under the MCP and additional elevations to build resiliency to future climate conditions. The EENF indicates that the MCP allows for such added resiliency as part of the remediation process, but the precise elevations that are required and/or will be authorized under the MCP process are not specified. As the added elevation could impact floodplain functions on the site, further assessment of off-site flood impacts should be provided as part of the Phase 2 DEIR.

Phase 1

According to the EENF, the Commonwealth has adopted ambitious targets to achieve net zero statewide greenhouse gas emissions by 2050. To meet these goals, the electric grid must rely principally or exclusively on offshore wind and other intermittent renewable resources such as solar energy. This reliance on intermittent renewable resources in turn requires significant battery energy storage deployment to reliably meet electric grid demands. According to the EENF, electric sector decarbonization goals and battery energy storage deployment are inextricably linked.

Phase 1 of the project consists of the construction of an approximately 700-MW BESS (Trimount Energy Storage Facility) on an approximately 20.4-acre portion of the site. According to the EENF, the facility will store excess high-voltage electricity produced when spikes occur at renewable energy generating facilities and at times when demand is lower than the available electricity. Energy stored at the facility will then be released to the grid at times of high demand via an underground transmission cable (“Gen-Tie”) connected to Eversource Substation 250. The Gen-Tie component of Phase 1 will be authorized by the Department of Utilities (DPU) pursuant to a Petition for Authority to Construct and Use a Line for the Transmission of Electricity under M.G.L. 164, § 72.¹

¹ Under jurisdictional rulings issued by the Energy Facilities Siting Board (EFSB) in Cranberry Point Energy Storage, LLC, EFSB 21-02 (May 11, 2023) and Medway Grid, LLC, EFSB 22-02 (May 11, 2023), battery energy storage is no longer considered a “generating unit” for purposes of triggering EFSB jurisdiction. Accordingly, Phase 1 also does not trigger MEPA review thresholds related to electric generating facilities under 301 CMR 11.03(7)(a)1. & (7)(b)1.

The facility will include two sections, one located north of Beacham Street and the other south of Beacham Street. It will include two open-air substations, both of which will cover an area of approximately 90,000 sf (2.1 acres); a 5,000-sf warehouse building for storage of equipment; an 800-sf office building for personnel operating the facility; battery cells grouped together in containers; power control system units; and inverters. Each section will be surrounded by a 2-ft thick wall ranging in height from 10 feet to 40 feet. The BESS will be linked to the Eversource Substation 250 on Alford Street in Boston via two electrical circuits in a 2,900-ft long underground conduit. The conduit will be constructed under existing streets along a route following Beacham Street, Dexter Street, Robin Street, and Alford Street.

Phase 2

Phase 2 of the Master Plan project involves the redevelopment of the 65.6-acre portion of the site outside of the Phase 1 area with a combined total development of approximately 7.19 million sf of mixed uses over the entire project site. Phase 2 will include 3,300,000 sf of lab/office space, 2,815,000 sf of residential space (3,200 residential units), 400,000 sf of industrial space, 400,000 sf of high-tech manufacturing space, 240,000 sf of retail space, and 36,000 sf of maker space. According to the EENF, Phase 2 will be designed to include recreational space, community amenities, pedestrian- and bicyclist-friendly streets, and enhanced transit links. While Phase 2 was described conceptually in the EENF, as detailed below, a more detailed description of the project, its impacts, and proposed mitigation measures must be provided in the DEIR.

Project Site

The 86-acre project site is located in southeastern Everett. It is bordered to the east by industrial uses in Everett and Chelsea, to the north by active and non-active railroad tracks, to the west by residential and industrial uses, and to the south by industrial uses.

The site is the former Exxon Mobil Terminal, which consisted of fuel oil and asphalt stored in tanks throughout the property. The site is regulated under M.G.L. c. 21E MCP Regulations at 310 CMR 40.00 and has been assigned Release Tracking Number (RTN) 3-0000310. It is currently undergoing remediation to address soil and groundwater contamination associated with the former use of the site.

Approximately 25% of the project site consists of filled tidelands. The majority of the area of filled tidelands is located north of Beacham Street and considered landlocked tidelands and not subject to licensing pursuant to 310 CMR 9.00. The portions of the project located south of Beacham Street and east of Robin Street are located within the Mystic River Designated Port Area (DPA). Approximately 0.53 acres of filled tidelands located on the southern portion of the Phase 1 site are not considered landlocked and are subject to licensing by MassDEP.

As shown on Federal Emergency Management Agency (FEMA) Flood Insurance Rate (FIRM) maps numbers 25017C0439E and 25017C0443E (both maps effective June 4, 2010), most of the project site is not located within the 100-year floodplain; however, a portion of Alford Street in Boston through which a 340-lf portion of the Gen-Tie connection will be constructed is currently shown to be within the 100-year floodplain (Zone AE) with a Base Flood Elevation (BFE) of 10 feet above North American Vertical Datum (NAVD 88). According to the EENF, and as confirmed by the Water Resources

Commission (WRC), FEMA released preliminary FIRMs that show a revised delineation of the 100-year floodplain on the site. As depicted on the revised FIRMs, most of the Phase 2 site north of Beecham Street is within a Zone AE with a BFE of 10 ft NAVD 88. The revised maps show a change in the Zone AE along Alford Street such that the proposed Gen-Tie route does not pass through the floodplain. According to the WRC, the revised maps are expected to take effect next year. Because the proposed fill will elevate the site to a minimum of 10.7 ft NAVD 88, no portion of the site will be within the present-day 100-year floodplain upon completion of remediation. As discussed below, because the proposed fill in the Phase 2 site nonetheless may affect current floodplain functions (e.g., by potentially displacing flood water onto adjacent properties), further assessment of off-site flood impacts is warranted in the DEIR.

A portion of the Master Plan site (Phase 2) is located within an Environmental Justice (“EJ”) population designated as Minority. The site is within one mile of 54 additional EJ populations in Boston, Chelsea, Everett, Malden, Medford, and Somerville. The site is within five miles of 543 additional EJ populations designated as Minority; Income; English Isolation; Minority and Income; Minority and English Isolation; Income and English Isolation; and Minority, Income, and English Isolation. The EENF asserted that the Master Plan project will not generate over 150 new daily diesel-generated vehicular trips (from truck traffic) and therefore the Designated Geographic Area (DGA) is 1 mile; however, during the review period, the Proponents indicated that Phase 2 will generate approximately 426 New truck trips per day and that the DGA is 5 miles.

Environmental Impacts and Mitigation

Potential environmental impacts associated with the Master Plan (Full Build) project include generation of 63,022 unadjusted average daily trips (adt), including 62,474 New unadjusted adt; construction of 5,716 parking spaces, including 5,588 New spaces; use of 0.53 acres of filled tidelands subject to c. 91 licensing; use of 1,168,000 gallons per day (gpd) of water; and generation of 1,062,000 gpd of wastewater. Of these impacts, the following are associated with Phase 1: use of 0.53 acres of filled tidelands subject to c. 91 licensing by MassDEP; generation of 12 adt; use 413 gpd of water; and generation of 375 gpd of wastewater. According to the EENF, upon completion of the Master Plan project, impervious area will be reduced by 4.76 acres compared to pre-remediation conditions. The EENF indicated that an approximately 340 linear foot section of the Gen-Tie cable would be located in LSCSF based on the FIRMs currently in effect. The Proponents have submitted a Request for a Determination of Applicability to the Boston Conservation Commission to determine the need for permitting of that section of the Gen-Tie. However, as noted above, no part of the Gen-Tie route will be located in the floodplain based on the revised FIRMs.

Phase 1 will provide battery storage infrastructure to facilitate the incorporation of renewable energy from wind and other sources into the electric grid, and will minimize potential human exposure to contaminants on the site by remediating soil and groundwater. Measures to further avoid, minimize, and mitigate the environmental impacts of Phase 1 include: landscaping around the perimeter of the facility; a new stormwater management system that will meet the Massachusetts Stormwater Management Standards (SMS); a facility design that meets the all fire safety codes, including National Fire Protection Association (NFPA) Standard 855: Standard for the Installation of Stationary Energy Storage Systems; the use of sound barriers and equipment silencers to minimize off-site noise impacts of the facility; and implementation of construction-period measures to minimize traffic, noise, air quality,

and water quality impacts. According to the EENF, the Proponent of Phase 1 has committed to developing a Host Community Agreement with the City of Everett that will detail additional community benefits. The DEIR should identify all mitigation measures proposed for the Master Plan project, including any additional mitigation and community benefits identified for Phase 1 after the issuance of the Phase 1 Waiver.

Jurisdiction and Permitting

The project is subject to MEPA review and preparation of mandatory EIR pursuant to MEPA regulations (301 CMR 11.00) because it requires an Agency Action and exceeds the EIR thresholds at 301 CMR 11.03(6)(a)(6), generation of 3,000 or more New adt on roadways providing access to a single location, and 301 CMR 11.03(6)(a)(7), construction of 1,000 or more parking spaces at a single location. Phase 1 does not by itself meet or exceed any MEPA review thresholds.

Phase 1 requires a M.G.L. Chapter 91 License from the Massachusetts Department of Environmental Protection (MassDEP), an 8(m) Permit from the Massachusetts Water Resources Authority (MWRA), and a M.G.L. c. 164, § 72 (“Section 72”) Order Approving New Transmission Lines and a Comprehensive Zoning Exemption under M.G.L. c. 40A, § 3 from the Department of Public Utilities (DPU). Phase 2 requires a Vehicular Access Permit from the Massachusetts Department of Transportation (MassDOT) and an 8(m) Permit and Toxic Reduction and Control (TRAC) Permit from the MWRA. The Master Plan project requires a Public Benefit Determination (PBD) from the EEA Secretary and is subject to the MEPA Greenhouse Gas (GHG) Policy.

The Everett Conservation Commission issued an Order of Conditions (OOC; DEP File No. 022-0139) on June 20, 2024 for the placement of fill associated with remediation of the site. Phase 1 is anticipated to result in a Host Community Agreement, a Payment in Lieu of Taxes (PILOT) Agreement, and a Grant of Location for electric transmission line in a public right-of-way from the City of Everett;² a Subdivision Approval/ANR Endorsement from the Everett Planning Board; a Flammables Storage Permit from the Everett Fire Department; a Grant of Location for electric transmission line in a public right-of-way from the City of Boston Public Improvement Commission;³ and a National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) from the U.S. Environmental Protection Agency (EPA). The Master Plan project requires zoning approvals from the City of Everett; a Subdivision Approval/ANR Endorsement, Master Plan Special Permit, and Site Plan Approvals from the Everett Planning Board; a Sewer Connection/Use Permit from the Everett Sewer Department; and an NPDES CGP from the EPA.⁴

The Master Plan project will seek Financial Assistance from the Commonwealth. In addition, Phase 1 requires a c. 91 License and DPU approvals, both of which are functionally equivalent to full

² According to correspondence received from Gareth Orsmond, Pierce Atwood, on October 24, 2024, the Grant of Location was approved by the Everett City Council on October 15, 2024.

³ According to correspondence received from Gareth Orsmond, Pierce Atwood, on October 24, 2024, the Grant of Location was approved by the Boston Public Improvement Commission on August 22, 2024.

⁴ According to correspondence received from Stephanie Krueel, VHB, on October 24, 2024, the Everett City Council approved certain amendments to Everett zoning ordinances on October 15, 2024; these amendments acknowledge battery storage as an allowable use on the Master Plan site. While one or more special permits and site plan approvals are still required for Phase 2 to proceed, correspondence from Gareth Orsmond, Pierce Atwood, indicates that the Phase 1 project will not be seeking such permits and approvals as it intends to seek a comprehensive zoning exemption from the DPU.

scope MEPA jurisdiction. Therefore, MEPA jurisdiction is broad in scope and extends to all aspects of the project that may cause Damage to the Environment, as defined in the MEPA regulations.

Tidelands

Approximately 0.53 acres of the Phase 1 site consists of filled tidelands subject to M.G.L. c. 91 licensing; the Phase 2 site includes landlocked tidelands not subject to M.G.L. c. 91 licensing. Consistent with the provisions of *An Act Relative to Licensing Requirements for Certain Tidelands* (2007 Mass. Acts c. 168, § 8) (the Act), as codified in M.G.L. c. 91, § 18B, I must conduct a Public Benefit Review for projects in tidelands that are required to file an EIR. The procedures for seeking a PBD are set forth in 301 CMR 13.00. The Act states the following regarding the PBD:

“In making said public benefit determination, the secretary shall consider the purpose and effect of the development; the impact on abutters and the surrounding community; enhancement to the property; benefits to the public trust rights in tidelands or other associated rights, including, but not limited to, benefits provided through previously obtained municipal permits; community activities on the development site; environmental protection and preservation; public health and safety; and the general welfare; provided further, that the secretary shall also consider the differences between tidelands, landlocked tidelands and great pond lands when assessing the public benefit and shall consider the practical impact of the public benefit on the development.”

The following addresses each of the considerations identified in the legislation. Under the PBD regulations (310 CMR 13.00), water-dependent use projects such as this one are presumed to have a public benefit. The regulations also indicate that the PBD shall be issued after the issuance of a certificate concluding the MEPA process or the issuance of any waiver pursuant to 301 CMR 11.11. Accordingly, this PBD is being issued for Phase 1, which was granted a Phase 1 Waiver, and an updated PBD will be issued upon conclusion of MEPA review for the Master Plan project.

1. purpose and effect of the development

The Phase 1 project will redevelop a site formerly used for storage of fossil fuels with a battery energy storage facility that will store excess high-voltage electricity produced when spikes occur at renewable energy generating facilities and at times when demand is lower than the available electricity. Energy stored at the facility will then be released to the grid at times of high demand via an underground transmission cable (“Gen-Tie”) connected to Eversource Substation 250. As noted in the EENF, the project will help the Commonwealth meet ambitious targets to achieve net zero statewide greenhouse gas emissions by 2050. To meet these goals, the electric grid must rely principally or exclusively on offshore wind and other intermittent renewable resources such as solar energy. This reliance on intermittent renewable resources in turn requires significant battery energy storage deployment to reliably meet electric grid demands. The project will enhance the property by providing improvements to the streetscape, landscaping, appearance, functionality, stormwater management system and resiliency, and will protect public health by remediating contaminated soil and groundwater.

2. impact on abutters and the surrounding community

The project is a water-dependent industrial use in a DPA. The site is undergoing remediation of contaminated soil and groundwater to standards that will protect public health. During operation of the facility, it will generate 12 adt. The facility will be surrounded by a fence and landscaping and sound barriers and equipment silencers will be installed to minimize off-site noise impacts. The project includes construction of a new stormwater management system that will meet the Massachusetts Stormwater Management Standards (SMS). The facility will be designed to meet all fire safety codes, including National Fire Protection Association (NFPA) Standard 855: Standard for the Installation of Stationary Energy Storage Systems. During the construction-period, measures to minimize traffic, noise, air quality, and water quality impacts will be implemented. According to the EENF, the Proponent of Phase 1 has committed to developing a Host Community Agreement with the City of Everett that will detail additional community benefits. The agreement will be proposed as part of upcoming DPU proceedings. The project will continue its public engagement efforts after MEPA review is concluded and during subsequent permitting.

3. enhancement to the property

The project will enhance the property by remediating site contamination and converting a vacant property to active use for energy storage. The project will include a new stormwater management system and has been designed to be resilient to sea level rise/storm surge, extreme precipitation, and extreme heat under future climate conditions.

4. benefits to the public trust rights in tidelands or other associated rights

The project is presumed to have a public benefit because it is a water-dependent industrial use. The MassDEP Waterways Regulation Program will make a formal finding of water-dependency and confirm that the project meets all applicable M.G.L. c. 91 standards during licensing of the project.

5. community activities on the development site

The project is a water-dependent industrial use in a DPA and therefore public access to the site is not anticipated. As noted, Phase 2 of the Master Plan project will continue to undergo MEPA review, and is anticipated to provide additional opportunities for community activation.

6. environmental protection and preservation

Measures to avoid, minimize and mitigate impacts as summarized in the EENF Certificate include:

Environmental Justice

- The Phase 1 Proponent is anticipated to enter into a Community Benefits Agreement with the City of Everett
- The project will continue its public engagement efforts after MEPA review is concluded and prior to and during subsequent permitting
- Phase 1 will facilitate integration of renewable power into the electrical grid by supporting offshore wind generating facilities as they are developed

- A wall and landscaped buffer will be constructed around the perimeter of the facility
- The BESS will be designed to include noise barriers, mufflers on equipment, and quiet technology to minimize noise impacts
- Phase 1 will be designed according to standards developed for energy storage systems to minimize fire safety risks
- The Phase 1 Proponent will develop emergency response procedures in cooperation with the Everett Fire Department
- Contamination at the site will be remediated
- Mitigation measures listed below will minimize construction impacts on EJ populations

Wetlands and Waterways

- As a water-dependent industrial use, the Phase 1 battery energy storage project is presumed under the Waterways Regulations to serve a proper public purpose
- The stormwater management system will be designed to meet the SMS
- The facility will be required to meet c. 91 standards and conditions included in the c.91 license to be issued for the project.

Adaptation and Resiliency

- The Phase 1 site will be raised to at least elevation 14 ft NAVD 88, which exceeds the 2070 1% annual chance water surface elevation of 13.7 ft (as indicated in the MA Resilience Design Tool) and critical equipment will be elevated on pads to an elevation of at least 16.2 ft, which exceeds the 2070 0.5% annual chance wave action elevation of 15.4 ft NAVD 88 as indicated in the Tool
- Vegetation will be planted around the perimeter of the facility
- The Phase 1 project will decrease existing impervious area by approximately 4 acres
- The stormwater management system for Phase 1 will be designed to accommodate the 2070 50-year storm event 24-hour precipitation depth of 9.7 inches.

GHG Emissions/ Air Quality

- Space and water heating for Phase 1 buildings will be provided by electric heat pumps
- The buildings will be designed to meet the low air infiltration standards of the Stretch Code
- 25% of the parking spaces will have EV charging stations

Construction Period

- Develop and implement a Construction Management Plan in coordination with the City of Everett to outline measures to minimize impacts of construction vehicles, including truck routes, and staging
- Develop and implement a Stormwater Pollution Prevention Plan (SWPP)
- Noise mitigation measures include: conforming to City of Everett work hour regulations; installation/maintenance of mufflers on equipment and use of muffling enclosures; schedule activities during times of high ambient noise; turning off construction equipment when not in use and minimizing idling times; and locating noisy equipment at locations that protect sensitive receptors
- Construction-period air quality mitigation measures include: use of retrofitted diesel construction vehicles or vehicles using alternative fuels; use of dust control measures,

including wheel washing, project site vacuuming, truck covers and other measures; use of oxidation catalysts and catalyzed particulate filters on construction equipment; wetting of large areas of exposed soil; and perimeter dust monitoring

- Comply with all requirements of the Massachusetts Contingency Plan (MCP) regarding testing, handling, transporting and disposing of contaminated soil and sediment and provide notification to MassDEP if any previously unidentified releases of hazardous materials are encountered during construction.
- Comply with MassDEP's Air Pollution Control regulations pursuant to M.G.L. c.40, §54 and the Massachusetts Air Pollution Control regulations at 310 CMR 7.00, including anti-idling provisions and handling and disposal of asbestos.

7. public health and safety, and the general welfare

The project will promote public health and safety by supporting the storage of energy produced by offshore wind; remediating on-site contaminated soil and groundwater; following design standards developed for energy storage systems to minimize fire safety risks; developing emergency response procedures in cooperation with the Everett Fire Department; installing sound barriers and implementing other measures to minimize noise during operation of the facility; constructing a new stormwater management system; and constructing energy efficient all-electric buildings that minimize GHG emissions.

Enforcement of Public Benefits

In accordance with M.G.L. c. 30, s. 62I, the Proponent shall file a copy of the Certificate on the EENF and this PBD with MassDEP within 30 days of today's date to notify it that work will be conducted within tidelands. MassDEP will then have the authority to enforce the conditions outlined herein and in the PBD consistent with Chapter 30.

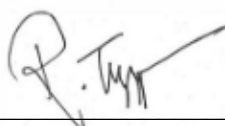
I recognize that the public benefit commitments may be subject to certain revisions as the project proceeds. If the public benefits to be provided should change, the Proponent is instructed to consult the MEPA Office to determine whether the change is sufficiently material to require the submission of a Notice of Project Change (NPC) pursuant to 301 CMR 11.10. If it is clear that the change(s) are material and would increase environmental impacts, the Proponent may submit an NPC without requesting an Advisory Opinion.

Conclusion

Based on the foregoing, I hereby determine that the Phase 1 project will have a public benefit in accordance with M.G.L. c. 91, § 18B. This Public Benefit Determination will be published in the Environmental Monitor. An updated PBD for the Master Plan project will be issued after completion of MEPA review for Phase 2.

December 23, 2024

Date



Rebecca L. Tepper

Comments received on the EENF:

09/17/2024 Sprague Operating Resources LLC/Hartree Partners
09/19/2024 City of Chelsea
09/20/2024 Mass Mobility Hub, Inc.
09/23/2024 Massachusetts Manufacturing Extension Partnership (MassMEP)
09/23/2024 Massachusetts Port Authority (Massport)
09/24/2024 Massachusetts Department of Environmental Protection (MassDEP)/Waterways
Regulation Program (WRP)
09/27/2024 Massachusetts Department of Transportation (MassDOT)
10/04/2024 Boston Harbor Now
10/04/2024 Environmental League of Massachusetts
10/15/2024 Massachusetts Water Resources Authority (MWRA)
10/17/2024 Maritime Alliance in Defense of Designated Port Areas
10/17/2024 Mystic River Watershed Association/Everett Community Gardeners/La Comunidad, Inc.
10/17/2024 Stephen Henry Kaiser
10/18/2024 City of Everett
10/18/2024 Conservation Law Foundation
10/18/2024 Office of Coastal Zone Management (CZM)
10/18/2024 Massachusetts Department of Environmental Protection (MassDEP)/Northeast Regional
Office (NERO)
10/18/2024 Water Resources Commission (WRC)
10/25/2024 Department of Energy Resources (DOER)

RLT/AJS/ajs