UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF THE
REGIONAL ADMINISTRATOR

December 10, 2004

Secretary Ellen Roy Herzfelder
Executive Office of Environmental Affairs
MEPA Unit
100 Cambridge Street, Suite 900
Boston, Massachusetts 02114

RE: Supplemental Draft Environmental Impact Report for Weaver's Cove Energy, LLC and Mill River Pipeline LLC, Liquified Natural Gas (LNG) Import Terminal, Fall River, Massachusetts, EOEA Number 13061

Dear Secretary Herzfelder:

This letter and attachment provide EPA's comments on the Supplemental Draft Environmental Impact Report (SDEIR) for the Weaver's Cove LNG project in Fall River, Massachusetts. The proposed project includes the development of an LNG import terminal, two natural gas laterals, and two meter and regulation stations. Development of the project would require dredging areas of the federal navigation channel and turning basin within the Taunton River and disposal of the sediment on the project site.

As you know, EPA submitted comments on the joint Draft Environmental Impact Statement (DEIS)/DEIR for this project in September this year. In those comments, we questioned both the adequacy of the analysis with respect to the alternatives, the dredging and disposal program, and associated impacts, and the acceptability of the project as proposed; and we recommended that the Federal Energy Regulatory Commission (FERC) prepare a supplemental Environmental Impact Statement. We were pleased to see that the MEPA certificate on the DEIR requiring the SDEIR highlighted many of the same issues and required a more complete investigation of alternatives, impacts and mitigation measures. We continue to believe that a combined Massachusetts Environmental Policy Act (MEPA) and National Environmental Policy Act (NEPA) process is an efficient public way to evaluate and better understand the impacts of the Weaver's Cove project proposal and alternatives to that proposal with the ultimate goal of informed decision-making at the local, state and federal level. We agree with your suggestion that efforts should be made to reintegrate the MEPA and NEPA processes at an appropriate point in the future–most likely when FERC prepares a Final Environmental Impact Statement (FEIS) for the project. In addition to our comments on the SDEIR (included in the attachment to this letter), we also intend to comment on any subsequent analysis provided by FERC pursuant to NEPA.

As we indicated in our comments on the DEIS/DEIR, EPA continues to believe that well sited LNG facilities in the region can help to maintain recent air quality gains and allow utilities to continue to provide heat and electricity to their customers without interruption.

We appreciate the opportunity to comment on the SDEIR and look forward to continuing to work with your office during the review of the Weaver's Cove project. Please contact Timothy Timmermann at 617-918-1025 with any questions about this letter.

Sincerely,

Elizabeth A. Higgins
Director, Office of Environmental Review

attachment

cc:

Ted Gehrig, Weavers Cove LLC
Ted Barton, Epsilon Associates
Christine Godfrey, US Army Corps of Engineers
Chris Boelke, National Marine Fisheries Service
Vin Malkoski, Massachusetts Division of Marine Fisheries
Dave Janik, Massachusetts Office of Coastal Zone Management
Rich McGuire, Federal Energy Regulatory Commission

Additional Detailed Comments for the Weaver's Cove LNG project SDEIR
Fall River, Massachusetts

EPA offers the following comments for your consideration as you evaluate the SDEIR analysis.

Alternatives

The DEIR Certificate called for an expanded analysis of the potential impacts "...associated with the alternative coastal locations examined in the DEIR, particularly Providence Harbor and the facility proposed off the shore of Cape Ann." Our comments on the DEIS paralleled the DEIR Certificate, noted that offshore LNG facility development was inappropriately eliminated as a reasonable alternative, and indicated that a comprehensive analysis is required for purposes of NEPA and the Corps of Engineers permit process. In addition to the information Weaver's Cove provides in the SDEIR, there has been an exchange between Weaver's Cove LLC and the proponent for the Excelerate Energy offshore project on the FERC docket for the Weaver's Cove project. Even though that exchange occurred after the SDEIR was published, we encourage you to review it for context and background as you evaluate the Weaver's Cove SDEIR.

The SDEIR argues that the Northeast Gateway project promoted by Excelerate Energy will not be able to provide reliable continuous service due to weather conditions, and that it is technically unproven, more environmentally damaging, and more expensive than the proposed Weaver's Cove project. Moreover, the SDEIR notes that "NEPA precedent is clear that a project proponent does [not] need to analyze every potential alternative that arises during the pendancy of an application."[1] The SDEIR also argues against the offshore energy bridge alternative because it would not be a functional substitute to the Weaver's Cove facility, since it would not be able to deliver LNG by truck to the peak shaving market.

While we recognize the applicant's interest in delivering LNG by truck as one component of the project, one that is reflected in the purpose and need statement in the DEIS/DEIR, we also believe that the National Environmental Policy act requires the consideration of a range of alternatives, including projects that might not be acceptable to the applicant because they are partial alternatives. Under NEPA, an agency's evaluation of alternatives needs to look at alternative means to achieve the general goal of an action, as defined by the agency from a broad public perspective rather than solely the applicant's. Alternatives providing only partial solutions to the applicant's goals should be considered if they are bounded by the notion of feasibility or are otherwise reasonable. In this instance, we view an alternative such as the Northeast Gateway proposal as a reasonable alternative that should be fully considered during the environmental review because it could bring a significant supply of much needed natural gas into the region. It is recognized that an offshore facility would be unable to meet the demands of truck deliveries of

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[1]We assume that the author intended to include the word "not" in this sentence given the context of the sentence.

LNG for the peak shaving and storage markets. However, an offshore facility or a combination of onshore and offshore facilities, could contribute to the region's supply needs. A comparison of the relative impacts of these individual alternatives should be a significant part of both the MEPA and NEPA processes.

Comparison of Weaver's Cove *(Taunton River/Mount Hope Bay)* dredging and Providence River dredging projects

The SDEIR identifies several unavoidable impacts associated with the dredging and ultimate operation of the project:

- 12 acres of winter flounder spawning habitat permanently lost through dredging
- ongoing prop wash impacts with each LNG tanker shipment
- ongoing entrainment/impingement impacts from ballast water exchange
- open trench construction of the gas pipeline across the Taunton River

The SDEIR then compares the proposed project to the Corps of Engineers' Providence River and harbor dredging project arguing that: 1) resource constraints that existed in the Providence River parallel those in the Taunton River; and 2) because the Providence River project advanced with specific conditions to protect the environment, similar conditions applied to the Weaver's Cove effort should eliminate significant impacts to the Taunton River and Mount Hope Bay. While we understand why the projects have been compared, it is important to recognize that there are significant differences between the two. In short , we do not agree with the premise that the dredging of the Providence River and the dredging proposed in the Taunton for the Weaver's Cove project are truly comparable based on both design and environmental conditions where the work is proposed. The justifications for our conclusion are outlined below. The differences between the projects lead us to support more comprehensive measures than have been suggested by the project proponent to protect the aquatic organisms of the Taunton River and Mount Hope Bay.

First, the conditions of aquatic resources in the two water bodies are different. Fish populations have declined throughout Narragansett Bay, but not to the extent that exists in Mount Hope Bay where they have collapsed to levels barely above zero. Sixteen of twenty one species historically caught in Mount Hope Bay have shown dramatic reductions in abundance since the mid 1980s. Mark Gibson, Deputy Chief of Rhode Island Division of Fish and Wildlife, statistically compared fish abundance in Narragansett Bay (including the Providence River) to fish abundance in Mount Hope Bay. Mr. Gibson found that winter flounder, hogchoker, tautog and windowpane are present at statistically significantly lower abundance levels in Mount Hope Bay than in Narragansett Bay.

Significant management actions have been and are being taken to address the loss of these resources. Both Rhode Island and Massachusetts have eliminated commercial fishing since the late 1980s in Mount Hope Bay. Strict recreational limits are also in place by both states which

essentially eliminate recreational fishing for winter flounder within Mount Hope Bay. The City of Fall River is just completing (December, 2004) Phase 1 of their Combined Sewer Overflow (CSO) plan at the cost of $110 million. Their efforts will eliminate slightly more than half of their CSOs into the Taunton River. By 2009 the city plans to complete a Phase 2 effort which will eliminate the remaining CSOs for a cost of approximately $45 million.

In addition, the Massachusetts Department of Environmental Protection (MADEP), Rhode Island Department of Environmental Management (RIDEM) and EPA have been working to reduce cooling water intake and thermal discharges from several power plants within Mount Hope Bay and the Taunton River to reduce entrainment and impingement losses and to improve habitat quality. Currently, Brayton Point Station has offered to reduce their flow and thermal discharge by 33% at a USGen cost estimate of $60 million. EPA and the Commonwealth of Massachusetts developed a discharge permit in conjunction with NMFS, MADMF, MACZM, and RIDEM that requires a 95% reduction in flow and thermal discharge from the facility. This permit is currently under appeal.

Several other important differences suggest that these dredging projects are not truly comparable. First, the temporal differences are substantial. Weaver's Cove proposes dredging over a minimum period of 3 years, while the Providence River effort took 18 months. As a result, the Weaver's Cove project has the potential to impact 3 separate spawning seasons. This potential to impact multiple spawning seasons is particularly troubling. The Taunton River serves as important spawning habitat for numerous anadromous fish and winter flounder, all of which have very high fidelity to their natal spawning grounds. Impacting multiple year classes of fish from one population jeopardizes the long term viability of that population. This is especially true for the winter flounder population in Mount Hope Bay.

Another significant difference between the two dredging projects is the dredge footprint. Superficially, it appears that both projects cover approximately similar linear distances--about 7 miles for the Weaver's Cove project and 10 miles for the Providence River project. In the Providence River, this large linear distance allowed project managers to move the dredges out of areas identified as winter flounder spawning habitat during the majority of the spawning season. This was possible because the volume of dredge material was relatively evenly distributed throughout the dredging footprint. Dredge volumes in the Weaver's Cove project are heavily weighted to the lower Taunton River--the area that is also home to critical fish spawning areas. Thus, the use of dredge sequencing is not a viable mitigation measure for the majority of the Weaver's Cove dredging activity.

Dredging issues

The SDEIR identifies measures Weaver's Cove will take to minimize the impact of dredging. These include the elimination of scow overflow, use of a closed bucket for dredging of soft sediments, dredging north and south in the Taunton River to minimize the turbidity plume that could affect anadromous fish passage, and the adoption of a Time of Year restriction (TOY) of

February, March and April for winter flounder spawning. EPA acknowledges these steps as an improvement over the initial proposal, but we still view the impacts from the dredging, even with the adoption of these management steps, as environmentally unsatisfactory. We believe that more comprehensive measures, described below, are necessary to prevent unsatisfactory impacts from the dredging.

Time of Year Restrictions

The use of TOY restrictions is a standard practice to avoid impacts to important spawning periods or times of fish migration. These restrictions vary waterbody to waterbody, because they are dependent on the aquatic resources present, the condition of those resources, and the likelihood that the proposed project will pose a threat to those resources. In Mount Hope Bay, TOY restrictions have been used in other projects in an effort to avoid or minimize impacts to fish populations. For example, Brayton Point Station has also conducted dredging near their dock facility and intake in accordance with established dredge windows.[2] In addition, rehabilitation of the state pier in Fall River has been subject to restrictions from January to July for inwater work and construction.

National Marine Fisheries Service (NMFS) has clearly laid out its recommended TOY restrictions of January 15 to July 31. These dates were chosen to protect winter flounder spawning, shellfish spawning, and anadromous fish inward migration and spawning. The Massachusetts Division of Marine Fisheries (MADMF) has provided TOY recommendations as well, which largely agree with those recommended by NMFS. However, MADMF extends the length of their recommended window until the end of October. The rational for this is to protect anadromous fish outward migration.

EPA has considered the specific activities involved with this project within the context of the resources present in Mount Hope Bay. Additionally, EPA has considered the current condition of those organisms and their extreme vulnerability, when determining the appropriate dredge windows. As a result, EPA believes that the more protective window recommended by MADMF is warranted to protect fish populations that are in a dire condition. This window is more extensive than the windows adopted for some of the projects (Brayton Point dredging, pier rehabilitation in Fall River) described earlier. The reason for this difference is that, in EPA's judgement, Weaver's Cove, due to the majority of its work occurring in the lower Taunton River, has a greater potential for impact to anadromous fish outward migration. We look forward to continuing our discussion of these issues with fisheries experts at the MADMF and the NMFS.

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[2]In addition, Brayton Point Station has been run in what's known as a "piggyback" mode from January through May. This mode of operation internally recycles cooling water from units 1,2 and 3 to be used in Unit 4. The result is a higher level of thermal discharge than the traditional open cycle mode, but a reduction in flow. This reduction in flow is seen as reducing entrainment and impingement of winter flounder and anadromous fish life stages.

Sediment deposition modeling

The proponent has developed a model to predict sediment deposition from the dredging project and attempted to use this model to predict impacts to aquatic organisms. The modeling exercise consisted of several steps: application of a hydrodynamic model to predict how water moves within Mount Hope Bay and the Taunton River; a physical model that moves the sediment particles; and a biological interpretation of critical thresholds that will elicit an effect in organisms of interest. This modeling exercise was partially conducted to justify the position that dredge windows (time of year restrictions) are not necessary to minimize impacts to aquatic organisms.

The hydrodynamic model was an existing model that had been originally developed and calibrated for use in predicting the thermal plume from Brayton Point Station. This model was reviewed and ultimately accepted by federal and state resource agencies. The physical model used to predict particle movement was the SSFATE model, which is also an EPA approved model. While we do not have any significant concerns on how either of these models operate, we have expressed concerns, most recently during an interagency meeting on October 8, 2004 hosted by the Corps of Engineers, about some of the inputs chosen by the applicant for the model simulations. Specifically, we continue to disagree with a number of inputs to the SSFATE model including: the loss rates of sediments from the dredge bucket, the egg incubation times for winter flounder, and assumed spawning depth of winter flounder. Further information on this issue may also be found in comment letters submitted in response to the DEIS/DEIR by the MADMF and NMFS. We believe that inappropriate inputs to the SSFATE model result in outputs which underestimate the effects of suspended sediments on the resources of the Taunton River, including winter flounder, anadromous fish and shellfish.

The most significant shortcoming with the modeling effort in our view is the biological interpretation of model generated output. One critical question is the effect of the proposed dredging on winter flounder spawning, egg survival and larval development. The applicant's model produced sediment deposition rates over a projected area and inferred impacts based on a burial depth of ½ the diameter of a typical flounder egg. This value was chosen after some brief conversations between the applicant and several scientists who have conducted some limited studies on this topic. EPA contacted these scientists and discovered that the ½ egg diameter endpoint is not an appropriate target for several reasons:

1. This value was recommended from a published study by Morgan et al. (1983), which examined the effect of sediments on striped bass and white perch eggs. Both of these species have a much shorter time to hatching (2-3 days) than winter flounder (21 days or more). Thus, concentrations that would elicit a reduced hatching rate after a 24-48 hour exposure time in striped bass and white perch, might elicit an even greater effect in winter flounder due to the substantially longer exposure time.

2. The applicant uses a value from Morgan et al.(1983) that represents an effect level (reduced hatching rate) as their target. We believe the analysis should have examined the

sediment deposition rates that produced a no-effects result. Additionally, Morgan et al. (1983) looked exclusively at hatching rate, but did not consider viability of the larvae immediately after hatch. Dave Nelson of NMFS, who has conducted experiments on the effect of sediment deposition on winter flounder eggs, reports that larvae hatched, but exhibited structural deformities and could only swim in circles, greatly reducing their chance of survival (Dave Nelson, personal communication). Thus, we believe the use of egg hatching rate is not the most sensitive way to assess the impacts of sediment deposition on winter flounder egg and larval survival and development. Moreover, EPA acknowledges that there is a paucity of peer-reviewed information to draw upon in assessing the impacts of sediment deposition on fish egg hatching and resulting larval viability. This lack of information is a critical weakness in this impact modeling effort.

As this time, we do not concur with either the inputs to the model, nor the resulting biological implications. We maintain that the impact to biological resources from suspended sediment generated by the proposed dredging has been significantly underestimated. Thus, the applicant has not provided acceptable justification that impacts to winter flounder eggs/juveniles, anadromous fish, and shellfish will be fully avoided. Should this project move forward in any fashion, seasonal work windows must be utilized to protect these organisms, as recommended by MADMF.

Entrainment/impingement

The SDEIR attempts to minimize the significance of the impact of entrainment and impingement by comparing volumes of ballast water taken by LNG ships to the volume of water in the river and comparing adult equivalent fish numbers to commercial catch numbers of those same species. Due to the proximity of this activity to the spawning habitat and the current status of the resource in the lower Taunton River and Mount Hope Bay, and the ongoing efforts to reduce impacts from other sources, EPA is still concerned with this potential source of impact to aquatic resources in Mount Hope Bay. Mitigation should be developed to address this impact when viewed either singly or cumulatively with other impacts of this project and other stressors in the ecosystem. Furthermore, this is an impact for which no mitigation has been proposed. We recommend that state of the art measures, such as fine mesh screens (such as are being proposed for the upstream desalinization plant in Swansea) or the use of gray water from Fall River in lieu of river water be studied and the results made available for agency and public consideration.

Invasive Species

The SDEIR states that because there will be no discharge of ballast water, invasive species are not a threat. This is an overly simplistic analysis of the issue. Research has shown that ballast water is but one of many ways that invasive species may be transported to new locations. Research is now showing that susceptibility of the water body may play an important role in determining

whether an invasion can occur (Stachowicz et al., 2002)[3]. There can be no doubt that the current level of degradation in Mount Hope Bay makes it a vulnerable system. Our comments on the DEIS/DEIR requested an analysis of the risk posed by invasive species from the LNG vessels to the water bodies of the various site alternatives. The SDEIR does not address this request.

Cumulative Impacts

The SDEIR attempts to minimize the significance of the project impacts by comparing it to other stressors within the Mount Hope Bay system. We believe that the more appropriate and relevant approach to cumulative impacts has been to look at the variety of stressors on a specific organism or water body and attempt to determine if the additive or synergistic effects of multiple stressors results in significant impacts to that aquatic organism. EPA has already determined, based on the available fishery data, that fish populations have collapsed in Mount Hope Bay. Based on that data, it has become apparent that fishing restrictions, which have been in place for over 10 years, are not sufficient by themselves to restore fish populations in Mount Hope Bay. As a result, we have aggressively attempted to reduce or eliminate other stressors on Mount Hope Bay water quality and fish populations. The City of Fall River has made major strides in reducing CSOs and we are attempting to dramatically reduce the impact of Brayton Point Station on Mount Hope Bay. If Brayton Point Station's final permit is implemented, the station will intake 20 billion gallons of river water a year. Consequently, at 1 billion gallons a year the ballast water withdrawal from LNG ships represents a more significant portion of the total entrainment impact.

EPA New England, in conjunction with other state and federal resource agencies, has worked to dramatically reduce cumulative impacts on fish populations in Mount Hope Bay. These efforts have been most aggressively pursued in the context of winter flounder. The proposed project would result in impacts to winter flounder by permanently eliminating 12 acres of spawning habitat, impacts to some undefined area of spawning habitat from sediment deposition for dredging (although not continuous) over a period of at least three years and the entrainment and impingement of eggs, larvae and juvenile fish during operation of the LNG facility. In an ecosystem as stressed as Mount Hope Bay, these additional impacts to winter flounder spawning habitat and early life stages are could substantially hinder recovery of the population with fidelity to the Taunton River.

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[3]Stachowicz, J.J., H. Fried, R.W. Osman and R.B. Whitlach. 2002. Biodiversity, Invasion Resistance and Marine Ecosystem Function: Reconciling Pattern and Process. Ecology, 83(9), 2575-2590.

Minimization and mitigation

The project proponent has proposed a minimization and mitigation package to offset impacts from dredging that includes[4]:

1. Use of a closed "environmental" bucket for all dredging of depositional sediments;

2. Implementation of a TOY restriction (to protect winter flounder spawning) for dredging in the turning basin during February, March and April. The SDEIR also indicates a willingness to consider a similar restriction for the area north of the Braga Bridge and south of the turning basin;

3. To minimize impacts to anadromous fish the dredge would work in a line parallel to the river current from March through July;

4. Salt marsh restoration: location and specifics to be worked out in the future, to offset the permanent loss of winter flounder spawning habitat (12 acres);

5. Shellfish relay: Removal of the quahogs within the dredge footprint by commercial fishermen with the intention of relaying them to another location;

6. Shellfish seeding: A one time reseeding of the lower Taunton River with quahog spat after completion of the dredging.

7. Appropriate monitoring and reporting

EPA does not believe that the proposed mitigation will sufficiently offset the expected environmental impacts associated with this project. Specifically, though salt marsh restoration is always a positive thing to accomplish, it will not replace lost winter flounder spawning habitat nor will it have an effect on improving winter flounder spawning in Mount Hope Bay. Our DEIS/DEIR comment letter provided additional details on our view of the shellfish relay and seeding.

In addition, other impacts that are not compensated for include disturbances associated with the pipeline crossing of the Taunton River, and, as discussed above, the entrainment and impingement associated with ballast water use. In addition, treatment options are not discussed to demonstrate how water quality standards and discharge criteria would be met for the project.
As stated above, EPA believes that Mount Hope Bay and the Taunton River serves as an

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[4]We note that the applicant has performed additional Tier III testing to determine whether a percentage of the dredged material may be suitable for offshore disposal. The results of that analysis will help to determine whether any of the proposed dredging impacts to the Taunton River ecosystem can be further minimized by shortening the time required to dredge.

important ecosystem for a number of aquatic organisms including, winter flounder, anadromous fish and shellfish. While comparisons between the proposed project and projects in Narragansett Bay have been made in the SDEIR, we believe that the similarities are limited and that more protective measures are necessary to protect and continue to improve conditions for organisms and habitats within the Taunton River/Mount Hope Bay complex.

Air Quality Issues

Comments on General Conformity

In April 2004, EPA designated eastern Massachusetts as a moderate ozone nonattainment area under the 8-hour ozone standard and, after June 15, 2005, the ozone conformity applicability thresholds for this area will be 50 tons per year of VOCs or 100 tons per year of NOx emissions. The maximum estimated emissions of NOx and VOCs from the Weaver's Cove LNG Facility are under these thresholds and the facility is not expected to be in service until well after June 15, 2005. Therefore, if the FEIS is issued before June 15, 2005, we think it is appropriate for FERC to postpone the effectiveness of its general conformity determination until June 15, 2005 or later. In this case, general conformity is satisfied by yearly emissions below the applicability threshold for the life of the proposed Weaver's Cove LNG Facility.

New Source Review

We previously commented that under the Massachusetts Department of Environmental Protection's (DEP) definition of "building, structure, facility and installation" in 310 CMR 7.00, Appendix A, a marine vessel is part of a facility while docked at the facility. We also noted that emissions data included in the Weaver's Cove application indicate that the emissions from the vessels docked at the proposed facility combined with the emissions from onshore emission units would exceed the DEP's major nonattainment New Source Review (NSR) threshold levels. In response, the applicant agreed that the emissions from the vessels docked at the facility should be included for determining NSR applicability. However, the applicant clarified that only the LNG tankers dock at the facility and not the tugs. Therefore, only the emissions from the tankers should be included in any NSR applicability determination. The applicant calculated that the NOx emissions from the tankers (while docked) and the onshore emission units do not exceed the major NSR threshold levels.

Based upon the information presented, EPA concurs with the applicant's conclusion that the facility is not subject to the DEP's major NSR rules. However, EPA notes that the DEP's plan approval for the facility will include a 46.9 TPY facility-wide cap. This is relatively close to the DEP's major NSR threshold level of 50 TPY. Therefore, we recommend that the applicant work closely with the DEP to ensure the emissions estimates for the LNG tanker are accurate and do not exceed the NSR threshold levels. In addition, the state's 310 CMR 7.02 plan approval regulations require facility-wide caps used to avoid major source status to be federally enforceable. To fulfill this requirement, the applicant must work closely with DEP to develop practically enforceable

requirements beyond a simple tons-per-year cap. The cap must include short-term emission limits or operational restrictions with appropriate monitoring, recordkeeping, and reporting for all emission units, including the LNG tankers while docked, to ensure that DEP, EPA, and the public can effectively enforce the facility-wide cap.

Environmental Justice

Our comments on the DEIS/DEIR recommended a more comprehensive analysis of the impacts of the proposed project along with the other environmental and public health impacts caused by other facilities and activities that exist within the area. Specifically, we noted that an analysis of the total health impacts on sensitive receptors, such as children with asthma, in the area would serve as an adequate surrogate for examination of disproportionate impacts from an air quality perspective.

The SDEIR notes that, "Weaver's Cove has conducted extensive studies on the potential effects, including human health, economic and social effects, that the proposed project might have on minority and low-income populations....which were included in Resource Report 5 with Weaver's Cove's Application...". Resource Report 5, Section 5.2.3.1 describes health care services in the area, i.e., the number of hospitals and long-term care facilities, but there is no discussion of the health status of the residents in the affected communities, including asthma prevalence, or potential health impacts associated with the construction and operation of the LNG facility. We note the Weaver's Cove commitment to follow the Massachusetts Diesel Retrofit Program for large construction vehicles that will be permanently assigned to the project–one that would include the installation of oxidation catalysts and particulate filters on the construction vehicles. Although Resource Report 5, Section 5.4 notes that modeled impacts from significant emission sources associated with the project do not exceed the National Ambient Air Quality Standards, it may be prudent for Weaver's Cove to analyze the cumulative effect of these emissions, as well as the vehicle exhaust emissions projected during construction and operation of the facility, on the health of residents in the surrounding communities and propose actions to mitigate any additional burdens to at-risk populations. Again, we refer you to a study of school-based asthma surveillance in Massachusetts located at www.asthmaregionalcouncil.org, as a starting point for your analysis of potential health impacts of the project on the surrounding communities.