



SMART GROWTH AND REGIONAL COLLABORATION

Statement Released by Marc Draisen, Executive Director of the Metropolitan Area Planning Council (MAPC), September 14, 2020
Subject: MAPC releases Independent Evaluation of Fore River Health Impact Assessment

Today, I am releasing an independent evaluation of the Health Impact Assessment (HIA) regarding the proposal to site a natural gas compressor station in Weymouth, MA. The evaluation was conducted by Public Health by Design (PHD), a consulting group with broad expertise in international standards for the conduct of HIAs. PHD is based in London, England.

MAPC completed the HIA in January 2019. We hired PHD in October, 2019 to assess how MAPC conducted the HIA in comparison to international standards. The evaluation was originally to be completed in the spring of 2020, but the review process was delayed by the COVID-19 pandemic.

MAPC, a public agency established under MGL Ch. 40B, Section 24, serves as the Regional Planning Agency for the people who live and work in the 101 cities and towns of the Greater Boston region, including the proposed location of the natural gas compressor station. We conducted the HIA under contract with the Massachusetts Department of Public Health (MDPH) in 2018, after responding to a Request for Proposals (RFP) seeking a vendor to perform an HIA in collaboration with MDPH and Massachusetts Department of Environmental Protection (MassDEP). The goal of the HIA, outlined in a directive from Governor Baker, was to, “document the current background air levels at the site and the current health status of the community...[and] consider the future air quality impacts of the proposed project on public health.” The HIA, released in January 2019, found that changes in emissions, noise, and land use and natural resources due to the compressor station were unlikely to cause negative health effects through direct exposure under typical operating conditions.

In its evaluation, PHD concluded that much of the evidence collected and described in the HIA, and many of the procedures followed, were adequate, balanced, and of good quality and that the overall HIA report and process was in line with international HIA practice. However, PHD also described ways in which the HIA could have been strengthened, and MAPC is committed to incorporating these recommendations into our future practice. Specifically, four elements deserve a special mention:

- 1) **HIA scoping limitations.** PHD found that the HIA was limited by Governor Baker’s Directive, which narrowed the HIA’s scope and split the air quality assessment from other health-relevant issues, including public safety in the case of malfunction and impacts on climate. Furthermore, the time allocated to complete the HIA, and the resources made available for that purpose, were highly constrained.

PHD concluded that MAPC could have considered a series of alternative approaches to ensure public safety- and climate change-related impacts were reviewed, all of which are good ideas that we will consider implementing if a similar circumstance presents itself in the future.

MAPC undertook the project in good faith, confident that other parties would review concerns that were not included in our scope. We facilitated a complex public engagement process and produced a highly detailed HIA, which contributes to the understanding of the project and its likely impacts.



Nonetheless, in the future, we will be less likely to undertake a project where the scope is artificially constrained by directive, time, or money, unless we can adequately ensure through other means that all relevant issues will be analyzed.

- 2) **Cumulative pollutant exposures assessment.** PHD found that MAPC should have gone further in the assessment of cumulative exposures in the study area. While MAPC's methodology was consistent with that applied by MassDEP and included background levels of air pollution, PHD identified a set of practices and approaches to improve MAPC's assessment of health effects from cumulative exposures. In the future, MAPC will use such methods in our HIAs to reflect best practices and emerging methods. Beyond the recommendation in the Review, MAPC will also encourage MassDEP to reconsider its own practices and to evaluate pollution-generating infrastructure based on the cumulative impact of existing as well as new emissions.
- 3) **Environmental Justice communities.** PHD also found that MAPC did not conduct adequate outreach to nearby Environmental Justice communities or ensure their residents were represented on the Advisory Committee. We accept the finding and will alter future practice accordingly. We will find ways to have more direct interaction with EJ community members, to include them in project design and implementation, and where appropriate to provide resources for resident-led engagement.
- 4) **Health impacts of emissions below regulatory thresholds.** Finally, PHD found that the findings of the report tended to under-estimate the possible health effects of emissions that fall below regulatory thresholds. In the future, we will create a framework to assess impacts across both regulatory and non-regulatory thresholds. Existing regulatory thresholds are generally science-based, but they can lag or potentially exclude more recent science that indicates health effects below current levels. MAPC will employ a broader assessment framework in the future to clarify the distinction between regulatory thresholds and health effects.

Beyond the issues raised in the Review we are releasing today, MAPC wishes to reiterate its opposition to the natural gas compressor currently under construction in Weymouth. Our opposition is only strengthened by last Friday's shutdown and natural gas venting at the site, which elevate the lack of clarity around potential public safety impacts on life and property in the event of a serious mechanical or oversight failure. We also continue to oppose the facility due to the fact that it will increase fossil fuel emissions in Massachusetts and beyond, with dire long-term consequences for the world's climate. The facility will also make it more difficult for the Commonwealth to achieve its emission obligations under the Global Warming Solutions Act.

Whatever differences we may have on the health impacts of emissions from the facility under normal operations, MAPC is united with the opponents of the compressor on the issues of public safety and climate change.

MAPC is grateful to Public Health by Design for their independent evaluation of this HIA and to the community stakeholders who shared their perspectives with the evaluation team. We are committed to strengthening future HIAs and will use the lessons learned from this report to do so.

Read the full evaluation report here: <http://bit.ly/PHDevaluation>