



BERKSHIRE ENVIRONMENTAL ACTION TEAM

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Protecting the environment for wildlife in support of the natural world that sustains us all.

June 30, 2026

Secretary Rebecca Tepper

c/o Katherine Miller, MEPA Analyst

Massachusetts Executive Office of Energy and Environmental Affairs

Saltonstall Building, 100 Cambridge St #900

Boston, MA 02114

Comments of Berkshire Environmental Action Team on the Environmental Notification Form for Algonquin Gas Transmission Enhancement, EEA #17074

Dear Secretary Tepper,

Berkshire Environmental Action Team (BEAT) is a 501(c)3 organization with a mission to protect the environment for wildlife in support of the natural world that sustains us all. BEAT advocates for safe, clean, accessible energy for all and opposes toxic, dangerous fossil fuel infrastructure, including fracked gas pipelines, compressor stations, meter stations, LNG facilities, and expansions of local gas systems.

Thank you for the opportunity to comment on the Environmental Notification Form for Algonquin Gas Transmission Enhancement Project, EEA #17074. Please accept these comments regarding the Environmental Notification Form (ENF) for the proposed Algonquin Gas Transmission Enhancement Project Program. BEAT believes that the ENF raises several significant environmental concerns associated with the project.

Infrastructure Placement

Ware yards G1-WY-001, G-1-WY-002A and G1-WY-002B are proposed within areas designated as NHESP Priority Habitat. Construction activities associated with ware yards, temporary access roads, and temporary workspaces are expected to affect Priority Habitat and associated rare species. Because portions of the proposed infrastructure overlap with NHESP Priority Habitat, the Environmental Impact Report (EIR) should include site-specific surveys and an evaluation of potential impacts to state-listed species documented within the project area, including the American book lamprey, wood turtle, eastern box turtle, and frosted elfin. The EIR should also identify avoidance, minimization, and mitigation measures for these species,

consistent with the Massachusetts Endangered Species Action and the NHESP review requirements.

Algonquin reports that the Project would affect up to 14.01 acres of palustrine emergent wetland, palustrine forested wetland, and palustrine scrub-shrub wetlands. Given the extent of these impacts, the EIR should evaluate both short and long-term effects on wetland hydrology, vegetation communities, and ecological functions.

Soil compaction, vegetation loss, and hydrologic alteration associated with construction activities will result in long-term impacts to wetland functions and ecological communities. Wetlands are highly sensitive ecosystems, and even limited disturbance can alter hydrology, vegetation, and ecological functions. The sensitivity of wetlands is recognized under the Massachusetts Wetlands Protection Act (M.G.L. c. 131 § 40), which protects wetland resource areas because of the importance for flood control, groundwater protection, wildlife habitat, and water quality. Because the project would affect areas with particularly sensitive hydrology and soils, avoidance and mitigation efforts should be evaluated. The EIR should evaluate alternatives that avoid or minimize wetland disturbance to the maximum extent practicable and provide detailed site-specific mitigation and restoration plans. These measures could include avoiding mechanical grading within wetlands and minimizing the placement of construction infrastructure within or adjacent to wetland resource areas. The need for such measures is underscored by documented drilling fluid releases during previous HDD projects, including a 2024 frac-out associated with Algonquin's Sakonnet River Pipeline Replacement Project in Rhode Island. Long-term monitoring measures for affected wetlands and site-specific restoration plans should be included in the Environmental Impact Report.

Vagueness

The ENF frequently uses the term "practicable" when describing mitigation measures, including reductions in temporary workspace, narrowing of rights-of-way, and implementation of erosion and sediment controls. However, the ENF does not define the criteria that would be used to determine whether these measures are practicable.

Additional detail regarding the implementation of mitigation measures is needed to allow MEPA and the public to evaluate the effectiveness of these commitments. The Environmental Impact Report should clearly identify the circumstances under which specific mitigation measures would be implemented, including the criteria used to determine whether such measures are practicable. The EIR should also describe the locations, timing, and duration of proposed mitigation activities and explain how compliance with these commitments would be documented and monitored. In addition, the EIR should identify all locations where wetland grading is proposed and explain why less disruptive alternatives, such as matting, alternative construction techniques, or modifications to workspace design, would not be feasible.

Energy Alternatives

Under M.G.L. c. 30, § 62B and 301 CMR 11.07(6)(f), MEPA requires consideration of reasonable project alternatives that avoid or minimize environmental impacts. The EIR should therefore evaluate whether the projected demand of 73,500 dekatherms per day could be met through non-pipeline alternatives. The alternatives analysis should evaluate non-pipeline alternatives on their environmental merits rather than limiting consideration based solely on

existing contractual arrangements. The evaluation of renewable energy alternatives should incorporate recent developments in energy efficiency, electrification, renewable generation, energy storage, and demand-response technologies that reduce or eliminate the need for additional gas infrastructure.¹ This evaluation should include consistency with the Clean Energy and Climate Plan and the emissions limits established under the Global Warming Solutions Act.

Project Segmentation

The Algonquin Gas Transmission Enhancement Project should also be evaluated in the context of recent and proposed modifications to the broader Algonquin pipeline system. Enbridge has previously proposed several major expansions of the Algonquin Pipeline system including Atlantic Bridge, Algonquin Incremental Market (AIM), and Access Northeast. Although some components of these proposals were constructed, Access Northeast and parts of Atlantic Bridge were not completed. More recently, several smaller projects have been proposed separately, some of which are components of previously proposed system expansion projects.

Recent projects, including the E-1 System Regulator Installation Project (Ferc Docket CP24-21) and Sakonnet River Pipeline Replacement Project (FERC Docket CP24-49), have also increased system capacity. Additional proposals currently under development, including Project Beacon, would further expand the Algonquin system.

Although replacement of the Cape Cod Canal bridges necessitates relocation of existing pipelines, AGT has proposed infrastructure changes at that location that may increase system capacity. The EIR should evaluate these projects collectively to determine whether additional cumulative analysis is warranted.

Taken together, these projects raise questions about whether the cumulative environmental impacts of expansion of the Algonquin pipeline system are being fully evaluated. Consistent with MEPA regulations and the Executive Office of Energy and Environmental Affairs' *Cumulative Impact Analysis Guidance*, the Environmental Impact Report should evaluate the combined effects of past, present, and reasonably foreseeable future projects on natural resources, wildlife habitat, climate, and surrounding communities. Given the potential for connected actions and cumulative impacts, the MEPA Office should consider whether preparation of a full Environmental Impact Report is warranted.

Federal courts have similarly recognized that connected, cumulative, and similar actions may require broader environmental review when segmentation obscures the full scope of environmental impacts (*Delaware Riverkeeper Network v. FERC*, 45 F.4th 104 (D.C. Cir. 2022)). Although MEPA is distinct from NEPA, these principles are consistent with MEPA's approach to evaluating cumulative environmental impacts.

¹ Khan, A. H., Bahar, A. N., Islam, A., & Wahid, K. (2026). A review of battery storage technology in renewable energy utilization. *Arabian Journal for Science and Engineering*, 51(8), 10405–10427. <https://doi.org/10.1007/s13369-025-11038-4>


Sincerely,



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