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

June 22, 2025

Secretary Rebecca Tepper
c/o Nicholas Moreno, 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 Final Environmental Impact Report for Algonquin Gas Transmission's Cape Cod Canal Pipeline Relocation Project EEA No./Project ID 16947

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's No Fracked Gas in Mass program 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 Final Environmental Impact Report for the Cape Cod Canal Pipeline Relocation Project, EEA No. 16947.[1] Please accept these comments in opposition to the proposed pipeline relocation project.

INCREASE IN CAPACITY

The Cape Cod Canal Pipeline Relocation Project proposes to replace two bridge-mounted National Grid 10" 270 psi mains with one 2.2-mile 18-inch 750 MAOP pipeline installed via HDD (Horizontal Directional Drilling) under the canal and 3.5 miles of 16-inch pipeline connecting the two new meter stations.[2] As stated on this docket filed in March, a wider configuration running at nearly triple its original pressure at 750 psi and at larger diameter is a clear increase in gas transmission capacity to National Grid's Cape Cod branch of its local gas distribution network. Thus, the claim that gas flow will remain unchanged is unsupported unless Algonquin commits to preserving metering stations at their original capacity despite upgrades for such stations being available and relatively easy to implement regulatorily.

The project enables a notable increase in gas capacity at a time when Massachusetts law

[1] FEIR for Algonquin Gas Transmission Cape Cod Canal Pipeline Relocation Project, EEA No. 16947
[2] FEIR for Algonquin Gas Transmission Cape Cod Canal Pipeline Relocation Project, EEA No. 16497

mandates a drawdown and eventual decarbonization of the heating sector. Given the state's mandated goals to reach net zero emissions by 2050, any redesign of the system should maintain no more than the existing capacity. Building a larger infrastructure during a mandated reduction in fossil fuel use is inconsistent with the Commonwealth's statutory climate obligations. Furthermore, the Clean Energy and Climate Plan expects a substantial decline in natural gas demand in the building sector, raising questions about the necessity and long-term viability of new gas infrastructure.

REQUEST FOR ALTERNATIVES

BEAT respectfully requests that MEPA recommends no approval of state permits for the construction of this project in its current form and instead assert that a replacement pipeline built to match rather than expand current gas transmission capacity.

Projects that expand gas capacity should not be approved. In spite of this matter, the Final Environmental Impact Report has not assessed alternative courses of action to decrease gas deliverance to Cape Code and does not question but rather assumes the necessity of the current volume of gas delivery for the future. We request that MEPA not allow increased fossil fuel infrastructure in light of the mandated 2050 phase out and examine pathways consistent with the Commonwealth's climate laws and decarbonization planning. This analysis should include a moratorium on any increase in gas service, as well as a system "sunset" plan from National Grid with a defined timeline for decarbonization of this branch of their service territory. Alternatives should also evaluate electrification of heating systems, targeted electrification strategies, and networked geothermal systems.

As stated earlier in this same docket, increased pipeline capacity risks locking in fossil fuel infrastructure with a typical lifespan of 40 to 80 years, enabling additional gas distribution expansion and creating risk of stranded assets for ratepayers as demand for gas declines under state climate policy. MEPA should therefore evaluate the full lifecycle climate and economic impacts of the proposed project, not solely the construction impacts described in the FEIR.

Under Department of Public Utilities Order DPU 20-80, gas utilities are required to develop plans for transitioning away from fossil gas infrastructure, including electrification and networked geothermal systems.

Massachusetts policymakers are also developing a Clean Heat Standard intended to accelerate electrification and reduce fossil fuel heating emissions across the building sector. While this policy is under development, it further signals a statewide transition away from fossil gas heating and reinforces the need to evaluate the long-term necessity of expanding gas transmission capacity.

MEPA needs to invest in gas system retirement planning. Transitioning consumers off of natural

gas for heat is mentioned in the FEIR, but dismissed as infeasible. Similar transitions have been successfully implemented elsewhere when policy leadership prioritizes them.[3] [4]

WETLAND AND PROTECTED LAND IMPACTS

Algonquin's Final Environmental Impact Report states that since all wetland impacts are "temporary and fully restorable," no compensatory mitigation is necessary to fulfill the requirement for its 401 Water Quality Certification.[5] However, Algonquin defines itself what "temporary" means outside of independent scientific determinations. We request the MEPA office to scrutinize this claim, avoiding the issuance of a 401 Water Quality Certification unless and until MassDEP has determined on its own and independent authority that any impacts on wetlands and rare species habitat areas are truly temporary and restorable.

UNDERGROUND DRILLING

The proposed method of installation for the 18 inch G-31 pipeline is horizontal directional drilling 87 feet beneath the Cape Cod Canal bed. One of the hazards associated with HDD is frac-out, or leakage of drilling mud containing water and minerals into the surrounding area. In Algonquin's recent HDD crossing at the Sakonnet River Crossing in Rhode Island, the company spilled drilling fluid into a wetland in Portsmouth.[6] At Cape Code, spills into the active waterway are possible and should be a cause for concern unless Algonquin directly addresses the hydrology and geomorphy of the Canal during their planning.

M&R EMISSIONS

Four proposed Metering and Regulating stations are projected in Algonquin's Final Environmental Impact Report to increase yearly volatile organic compound emissions by four tons and hazardous air pollutants by 360 kilograms. Three of these stations are within 1 mile of an Environmental Justice community. We request that the MEPA office recommend an Environmental Justice Analysis be done before station permitting.

Climate legislation passed during the last few legislative sessions has set the policy direction for Massachusetts' energy transition, aiming for broad, multi-sector decarbonization by 2050.[7]

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[3] Maine not only reached its 100,000 home transition plan two years early, but is setting a new goal for an additional 175,000. "Expanding Use of Heat Pumps Across Maine", press release from Office of Governor Janet T. Mills, August 23, 2004.

[4] California's "Heat Pump Partnership shows adoption of 300,000 heat pumps in a year and a half, 2024 to July 2025.

[5] FEIR for Algonquin Gas Transmission Cape Cod Canal Pipeline Relocation Project, EEA No. 16947

[6] During work on the Sakonnet River pipeline replacement, drilling fluid leaked out. It is unclear whether the contents were toxic given the varying accounts of the situation by environmental groups and Algonquin and the possible existence of proprietary chemicals not required to be disclosed.

[7] *"As mandated in the 2021 Climate Law and the state's Clean Energy Climate Plan, the Massachusetts residential sector must achieve a 95% reduction in greenhouse gas (GHG) emissions below 1990 levels by the year 2050 and a 50% reduction in GHG emissions by 2030."* Energy Efficiency and Decarbonization, Mass.gov.

The Global Warming Solutions Act requires substantial greenhouse gas reductions, including a 50 percent reduction by 2030 and a net-zero emissions by 2050. Under the 2021 Climate Roadmap Act, agencies are required to align decisions with the Commonwealth's mandated decarbonization pathway.

Although the Department of Transportation's (DOT) need to replace the Sagamore and Bourne bridges over the Cape Cod Canal obviates the need to remove and replace the existing gas pipelines, this proposal by Algonquin is more than just a mere "Pipeline Relocation." It opens the door to not just future expansion of National Grid's LDC footprint, but any other future takers who may want to purchase from AGT in the future life-span of this project. It is up to MEPA to point out the incoherency of this proposal with Massachusetts state environmental policies.

Sincerely,

Brittany Ebeling
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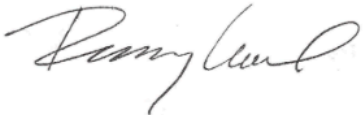
Melanie McCarthy
Deputy Director, Berkshire Environmental Action Team



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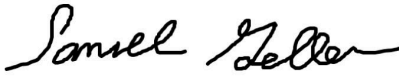
A program of Berkshire Environmental Action Team



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