

Springfield Public Health Council Meeting, January 20, 2016
Michaelann Bewsee, Arise for Social Justice
Stop Toxic Incineration in Springfield

Why the Springfield Public Health Council should find that a Site Assignment Hearing is appropriate for Palmer Renewable Energy's proposed biomass incinerator

1. **Trucks:** PRE anticipates 140 truck trips (roundtrip) a day. PRE has agreed to retrofit 25 trucks owned by their fuel provider, Northern Tree Service, which will reduce emissions by close to 90%. However, there is no guarantee that only those 25 trucks will be used, or that they could make all necessary trips in those days. Even with improved emissions, there will be a net increase in emissions in the neighborhood, as well as increased noise.
2. **Climate Change and Public Health:** Does the Public Health Council have a right to be concerned about the impact of climate change health effects? I would say that it does, and so does the Bureau of Environmental Health, Mass Dept. of Public Health. See document. In fact the Bureau intends to provide technical assistance to help Boards of Public Health address the health effects of climate change on their communities.

In October, 2015 PRE asked the MA Dept. of Energy Resources to relax their efficiency standards so that PRE might become eligible for renewable energy credits. The Commonwealth recognizes that a biomass plant such as is proposed by PRE is not energy efficient.

The Commonwealth also recognizes that burning wood for energy is not carbon-neutral, emits greenhouse gas emissions, and thus contributes to climate change. See the Manomet Study, commissioned by the Dept. of Energy Resources.

The City of Springfield recognizes climate change as an important issue for the long term well-being of the city. It has convened a working group to develop a climate change plan for the city, and is a finalist for the HUD-sponsored Natural Disaster Resiliency Competition, to mitigate climate change impacts.

3. **Environmental Justice:** All of the census block in which PRE intends to build is defined by the state as an environmental justice community—in fact, more than two-thirds of the city falls within that designation.

What is Environmental Justice? According to the Dept. of Environmental Protections' new draft policy,

DEFINITIONS

Environmental justice is based on the principle that all people have a right to be protected from environmental pollution and to live in and enjoy a clean and healthful environment regardless of race, income, national origin or English language proficiency. ***Environmental justice*** is the equal protection and meaningful involvement of all people with respect to the development, implementation, and enforcement of energy, climate change, and environmental laws, regulations, and policies and the equitable distribution of energy and environmental benefits.

"Meaningful Involvement" means that all neighborhoods have the right to participate in partnership with government in energy, climate change, and environmental decision-making including needs assessment, planning, implementation, compliance and enforcement, and evaluation, and neighborhoods are enabled and administratively assisted to participate fully through education and training means, and encouraged to develop environmental, energy, and climate change stewardship.

"Environmental Justice (EJ) Population" means a neighborhood whose annual median household income is equal to or less than 65 percent of the statewide median or 25% of its population is Minority, Lacking English Language Proficiency, or its childhood cancer/lead poisoning or asthma rates are statistically significantly higher than the statewide averages.

STATEMENT OF PURPOSE

It is the policy of the Executive Office of Energy and Environmental Affairs that environmental justice shall be an integral consideration to the extent applicable and allowable by law in the implementation of all EEA programs, including but not limited to, the grant of financial resources or technical assistance, the promulgation, implementation and enforcement of laws, regulations, and policies, the provision of access to both active and passive open space, and the diversification of energy sources, including energy efficiency and renewable energy generation.

Nationally, the need for environmental justice has been most widely recognized in communities of color and low-income communities. This Policy builds on federal environmental justice guidelines in ways that reflect the needs and circumstances specific to Massachusetts. It targets EEA resources to service those high-minority/low-income neighborhoods in Massachusetts where the residents are most at risk of being unaware of or unable to participate in environmental, energy, or climate change decision-making and/or health impacts. Working with these EJ populations, EEA will take direct action as part of the implementation of this Policy to restore degraded natural resources, to increase access to open space and parks, to address environmental and health risks associated with existing and potential new sources of pollution, to appropriately address climate change, and to improve overall quality of life by:

- Enhancing opportunities for residents to participate in environmental, energy, and climate

- change decision-making;
- Enhancing the environmental review of new or expanding significant sources of environmental burdens in these neighborhoods;
- Ensuring that residents are prepared for and resilient to the effects of climate change (such as heat island effect or flooding) and ensuring that these effects are minimized during development;
- Ensuring that existing facilities in these neighborhoods comply with state environmental, energy, and climate change rules and regulations;
- Ensuring these neighborhoods benefit from positive impacts of environmental programs, grants and investments; and
- Encouraging investment in economic growth in these neighborhoods where there is existing infrastructure, in particular where an opportunity exists to restore a degraded or contaminated site and encourage its clean, productive and sustainable use.

EJ populations are those segments of the population that EEA has determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources. They are defined as neighborhoods (U.S. Census Bureau census block groups or for health data, census tract levels) that meet *one or more* of the following criteria:

- The median annual household income is at or below 65 percent of the statewide median income for Massachusetts; *or*
- 25 percent of the residents are minority; *or*
- 25 percent of the residents are lacking English language proficiency; *or*
- Childhood cancer/lead poisoning or asthma rates are statistically significantly higher than the statewide averages.

13. Enhanced Public Participation Under MEPA.¹ As part of the Secretary's commitment to

Environmental Justice, enhanced public participation will be required for the following projects as they undergo review in accordance with MEPA:

- (1) Any project that exceeds an Environmental Notification Form (ENF) threshold for air, solid and hazardous waste (other than remediation projects), or wastewater and sewage sludge treatment and disposal²; and
- (2) The project site is located within one mile of an EJ Population (or in the case of projects exceeding an ENF threshold for air, within five miles of an EJ Population).
- **17. Enhanced Public Participation and Analysis of Impacts and Mitigation Under the Energy Facilities Siting Board ("Siting Board")**
- The Siting Board shall continue to use enhanced public participation procedures in its review of energy facility petitions based on the defined project parameters used by MEPA, noted in Section 14 above. The Siting Board shall continue to require petitioners to translate public hearing notices into languages relevant to affected environmental justice populations and to

publish such notices in both English and foreign-language media outlets as well as to post notices in community locations that reach EJ populations. In addition, the Siting Board shall continue to require that translators be available at public comment hearings for project locations where EJ populations are present.

- The Siting Board is required by statute to assess air, water resource, wetlands, solid waste, visual, noise, local and regional land use, and cumulative health impacts for jurisdictional generation facilities. Decisions issued by the Siting Board include measures to mitigate impacts for the affected communities. The Siting Board considers the term "cumulative health impacts" to encompass the range of effects that a proposed facility could have on human health due to exposure to noise, electromagnetic fields and substances emitted during construction and operation of the facility, as well as possible effects on human health unrelated to substances. The Siting Board considers these effects in the context of existing baseline health conditions and existing background conditions and, when appropriate, likely changes in the contributions of other major emissions sources.
- 32. **Adaptation.** EEA agencies shall consider the current and future impacts that climate change will have on EJ populations. In doing so, EEA agencies shall take appropriate measures towards ensuring that EJ populations are equally protected from hazards and health risks imposed by future climate changes and properly informed of appropriate measures taken to increase their adaptive capacity. Furthermore, EEA agencies shall collaborate with other Secretariats when awarding grants around climate resiliency to ensure that vulnerable populations are considered in the process.

The neighborhood in which PRE proposes to build its incinerator is populated with people who are already more vulnerable to the effects of pollution, especially air pollution. Whether PRE meets DEP's air permit standards is irrelevant, as those standards are not sufficiently protective of vulnerable communities.

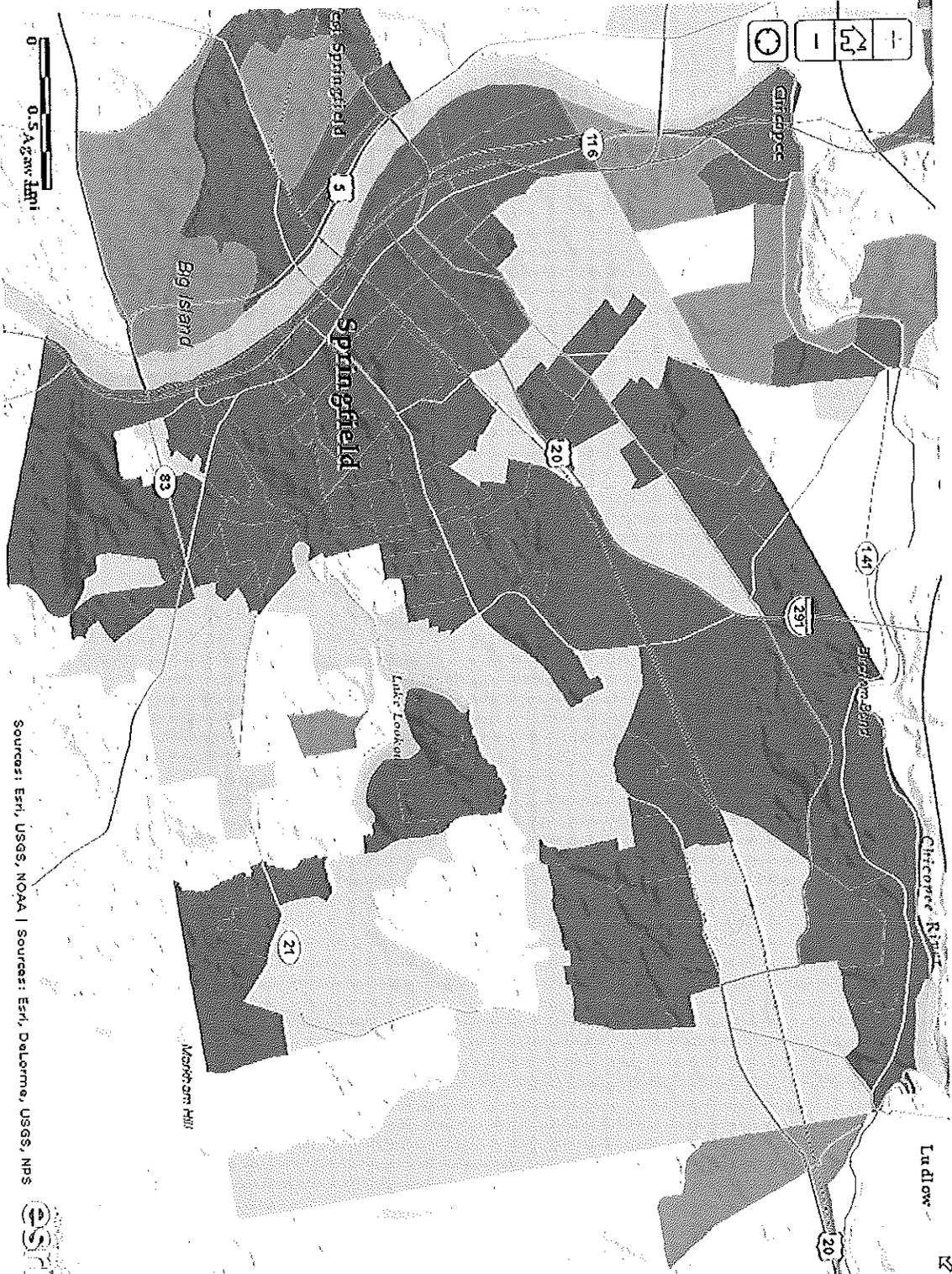
In addition, many Springfield schools are within a five-mile radius of PRE's proposed plant. See map. Asthma rates in the majority of these schools are much higher than the state average.

We urge the Springfield Public Health Council to hold a site assignment hearing to further understand the health impacts of PRE's proposed incinerator.

Legend

MA 2010 Environmental Justice
Blockgroups

- Minority
- Income
- English isolation
- Minority and Income
- Minority and English isolation
- Income and English isolation
- Minority, Income and English isolation



Sources: Esri, USGS, NOAA | Sources: Esri, DeLorme, USGS, NPS

