



Advocacy Department

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September 12, 2016

Beverly Schultz, Project Manager  
Eversource  
One NSTAR Way  
Westwood, MA 02090

Via Email: [Beverly.Schultz@Eversource.com](mailto:Beverly.Schultz@Eversource.com)

**Re: Eversource Transmission Line, Sudbury to Hudson**

Dear Ms. Schultz,

On behalf of Mass Audubon, I am writing to request that Eversource consider alternatives for the proposed Sudbury to Hudson Transmission Reliability Project. We understand that the proposed new 8.9 mile, 115kV transmission line is deemed necessary for system reliability. However, the preferred route has significant, permanent impacts on many other important public interests that must also be considered. Several permanently protected lands would be impacted including the Assabet River National Wildlife Refuge, Marlboro State Forest, Sudbury Valley Trustees Memorial Forest, and Hop Brook Marsh Conservation Land. The effects on these federal, state, local, and nonprofit conservation lands would be significant and ongoing. Large, interconnected areas of forestlands and wetlands are vital for ecological health and integrity. Clearing an 82 foot wide swath through these lands would fragment wildlife habitat, create adverse edge effects, and increase impacts from invasive plants and illegal ATVs (both of which are costly and difficult to manage). The cleared Right-of-Way (ROW), poles, and wires also would impact the character and recreational value of the conserved lands. Vegetation management along the ROW would require frequent use of mechanized mowing or cutting equipment and/or herbicides, all of which have additional impacts on wildlife and the environment.

Mass Audubon understands that the reliability of the electric grid is an important priority for public utilities. As Eversource plans for those projects, both in this instance and in other locations, the full costs of overhead vs. underground lines should be considered in lifecycle terms. Underground lines, including lines constructed within roadways, are more expensive initially. However, they are more reliable, especially in the context of increasingly frequent extreme weather events associated with climate change. Over the many-decades-long service life of the lines, the costs associated with maintaining overhead lines and associated ROW are significant and should be taken into account.

In calculating the costs of constructing lines through and adjacent to protected lands, the full costs and availability (or lack thereof) of mitigation lands of equivalent natural resource value must also be considered. The Executive Office of Energy and Environmental Affairs' policy on disposition of lands protected under Article 97 of the state Constitution requires not merely consideration of the market value of the impacted lands but also the natural resource value. In rapidly developing suburbs such as Sudbury and Hudson, land available for replacement conservation is limited, and it is not feasible to fully mitigate for the fragmentation effects on large blocks of woodland.

We urge Eversource to factor these considerations into alternatives analysis and cost accounting for this and other grid improvement projects, before submitting project proposals to the Energy Facilities Siting Board (EFSB). We also request that the utilities and EFSB plan for and support a transition to greater reliance on distributed, renewable power sources located at or near where the power will be consumed. This can reduce the need for expensive expansion of the grid system while supporting the transition to clean and green energy.

Thank you for considering these comments.

Sincerely,



John J. Clarke  
Director of Public Policy & Government Relations

cc: Energy Facilities Siting Board  
Conservation Law Foundation

*Mass Audubon protects 36,500 acres of land throughout Massachusetts, saving birds and other wildlife, and making nature accessible to all. As Massachusetts' largest nature conservation nonprofit, our wildlife sanctuaries located in cities and towns include 20 nature centers and welcome over half a million visitors annually. From inspiring hilltop views to breathtaking coastal landscapes, serene woods, and working farms, we believe in protecting our state's natural treasures for wildlife and for all people – a vision shared in 1896 by our founders, two extraordinary Boston women. Today, Mass Audubon is a nationally recognized environmental education leader, offering thousands of camp, school, and adult programs that get over 225,000 kids and adults outdoors every year. With more than 125,000 members and supporters, we advocate on Beacon Hill and beyond, and work with conservation science partners, to preserve the natural heritage of our beautiful state for this and future generations. We welcome you to explore a nearby sanctuary, find inspiration, and get involved. Learn how at [massaudubon.org](http://massaudubon.org).*

*Protecting the Nature of Massachusetts*