

December 15, 2016

Governor Charlie Baker
Massachusetts State House
Office of the Governor
Room 280
Boston, MA 02133

Secretary Matthew Beaton
Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

By email to: Matthew.Beaton@state.ma.us, constituent.services@state.ma.us

Re: Comments on proposed Sudbury-Hudson Transmission Line Project

Dear Governor Baker:

I write to you in regards to the proposed Eversource Energy transmission line project through the municipalities of Sudbury and Hudson, Massachusetts. Clean Water Action has serious concerns with the siting of the proposed project and urges Eversource to pursue an under-street, buried version of the project or otherwise consider non-wires alternatives to addressing area power grid needs. Should they decline to do so, we urge the state to reject the project.

Clean Water Action takes a nuanced view of energy infrastructure and our environment. Our organization seeks to protect water resources and conservation land while supporting development of low- and no-emission energy sources, maintaining grid reliability and keeping energy affordable. As a general practice, Clean Water supports a “no-build” or “low-build” analysis to seek alternative infrastructure development when high-impact projects are proposed.

The Sudbury-Hudson Transmission Line Project raises numerous concerns for Clean Water Action and we urge reconsideration of it. Transmission lines in New England are often costly for ratepayers. As evidenced by this proposal, transmission infrastructure construction can be unpopular amongst residents and highly destructive towards the local environment.

Our particular concerns regarding the proposal include the disturbance and destruction of highly important water resources, the use of detrimental herbicides, and the threat to local conservation lands. The proposed project would run through a number of wetland parcels, vernal pools, and other water resources of ecological and recreational importance.

Other stakeholders, such as OARS - For the Assabet, Sudbury and Concord Rivers, have emphasized the importance of brook trout habitat in the Sudbury River tributaries. Brook trout are an ecologically indicative species and are already under threat, as a majority of their habitat has been wiped out. The construction of the transmission corridor would diminish shade cover and would result in warmer and inhospitable river temperatures and potential pollution due to herbicide usage will negatively impact vulnerable brook trout populations.

Our environment is already overburdened by toxic chemicals. Increased use of herbicides to maintain vegetation along the transmission right of way will worsen this problem and bears particular concerns for vernal pools and wetlands. Worse, the use of herbicides, with their potential carcinogens, poses a threat to human health by potential contamination of area wells and aquifers providing drinking water for 18,000 Sudbury residents.

While we respect your interest in increasing the reliability of electric power in New England, we join our colleagues in firmly arguing that the Sudbury-to-Hudson Transmission Reliability Project is the wrong approach.

Clean Water Action adds its voice to the hundreds of citizens, organizations, and legislators speaking out against this project. We would suggest re-evaluating your energy goals and utilize modern technology to support the increasing integration of community-based clean energy sources to address the concerns of your customers. These alternatives would likely be preferential to ratepayers while avoiding harm to the environment and the immediate neighbors impacted by this project.

Sincerely,

Becky Smith
Campaigns Director
Clean Water Action

CC:

Sen. Ed Markey
Sen. Elizabeth Warren
Cong. Niki Tsongas
Cong. Katherine Clarke
Rebecca Tepper, Office of Attorney General Maura Healey
Sen. Mike Barrett
Sen. James Eldridge
Rep. Carmine Gentile
Jim Hunt, Eversource Energy
Jim Gish, Protect Sudbury, Inc.