



Sudbury Valley Trustees

December 7, 2016

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

By email to: constituent.services@state.ma.us
Re: Sudbury to Hudson Transmission Reliability Project

Dear Governor Baker:

Last March, we provided our comments on an Eversource proposal to construct a new 115 kV power line between Sudbury and Hudson. In that letter (included), we strongly opposed an above-ground option that followed an MBTA right-of-way through conservation land, and urged Eversource and other decision-makers to revisit a below-ground street-based alternative route that would bypass these natural areas.

Since then, Eversource has updated its proposal to include a street-based option as its Noticed Alternative Route, but still highlights the MBTA right-of-way as its Preferred Route with two options. Option A is the above ground design and Option B is its below ground design. Based on the information that Eversource has made available, I am writing to reiterate and clarify Sudbury Valley Trustees' (SVT's) comments on the alternatives:

1. SVT strongly supports a street-based route which Eversource has acknowledged to have minimal environmental impacts.
2. SVT strongly opposes the above-ground option that follows the right-of-way. The permanent scale and type of destruction to our conservation areas are unacceptable.
3. Similarly, SVT opposes a below-ground option that follows the right-of-way. Although the width of the decimated swath would be less than the above-ground option, the construction and maintenance impacts will still be significant resulting in irreparable damage to the conservation area. In addition, the perpetual use of herbicides along the right of way is extremely detrimental to this environmentally sensitive area.

Routing this utility line along the right-of-way would undo much of the significant investment that the Commonwealth, the U.S. Fish and Wildlife Service, the Town of Sudbury, the City of Marlborough, private foundations, and individual donors have already made in protecting and caring for one of the metrowest region's most important natural areas. For this reason, it appears that Eversource did not accurately consider the environmental impacts of its Preferred Routes when evaluating the three options. The permanent damage to topography, the wildlife, and the vegetation in this unique area cannot be understated. This impact is forever. The impacts of street-based route (none of which are environmental), while real, are temporary and can be addressed in the foreseeable future.

Based on these comments and the expected adverse impacts that we outlined in our March 28th letter, we ask that you urge Eversource to table both of its Preferred Routes using the MBTA right-of-way. Eversource should only proceed with its Noticed Alternative Route under existing streets.

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa Vernegaard". The signature is fluid and cursive, with a large initial "L" and "V".

Lisa Vernegaard
Executive Director

About Sudbury Valley Trustees (SVT). Sudbury Valley Trustees is a regional land trust that protects and cares for natural areas in the 36 communities that surround the Assabet, Sudbury and Concord Rivers. SVT owns the 220-acre Memorial Forest which abuts 4,112 linear feet of the proposed transmission line. Memorial Forest is part of the 900-acre Desert Natural area, which the proposed line would bisect. SVT has been working with five other municipal, state, private, and federal landowners to protect and manage this extraordinary natural area for over twenty years. Memorial Forest and the Desert are home to the globally rare pitch pine-scrub oak barrens community, which in turn hosts several rare and declining plant and animal species. Further, Memorial Forest and the Desert as a whole provide a rare opportunity for visitors to experience a natural area that is free from the effects of industrialization of the modern world. Over the past two decades, SVT and its partners have invested hundreds of thousands of public and private funds in both the protection and restoration of this area – an investment that would be seriously harmed by the construction and maintenance requirements of the proposed preferred routes through the MBTA right-of-way.

copies by email to:

Bev Shultz, Eversource

Melissa Murphy Rodrigues, Sudbury Town Manager

Tom Moses, Executive Assistant, Town of Hudson
Libby Herland, USFWS
Arthur Vigeant, Mayor, City of Marlborough
Elfriede Parker, Acting President, General Federation of Women's Clubs of MA
Priscilla Geigis, MA Department of Conservation and Recreation
MA Senator Jamie Eldridge
MA Senator Michael Barrett
MA Representative Carmine Gentile
MA Representative Danielle Gregoire
MA Representative Kate Hogan
Matthew Beaton, Secretary MA EEOEA; Chair, MA Energy Facilities Siting Board
US Senator Elizabeth Warren
US Senator Edward Markey
US Congresswoman Nikki Tsongas
US Congresswoman Katherine Clark
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Protect Sudbury