



**Protect Sudbury Position Paper:
Underground verses Overhead on the MBTA Right of Way (ROW)**

It is important to state at the outset that Protect Sudbury does not believe that ISO New England and Eversource have adequately proven the need for a new line between Sudbury and Hudson. In the event that Eversource could prove to the Energy Facilities Siting Board (EFSB) that a need exists for this new line, Protect Sudbury is aware of other viable siting alternatives that carry none of the environmental risks associated with an MBTA ROW siting. Further, it is our assessment that these alternatives could be constructed at a lower and/or comparable cost.

It is also important to understand that the EFSB makes the final decision as to where a new line is sited, not Eversource. The EFSB bases their decision on 3 parameters:

- Cost*
- Environmental impact and
- Reliability

*Cost has historically received the highest weighting in previous cases before the EFSB.

In the petition Eversource filed with the EFSB, 3 routes are offered:

- Overhead on MBTA ROW
- Underground on MBTA ROW
- Under street

Even if one were to assume that underground and overhead are equivalent on environmental impact and reliability, the cost of the overhead route (choice number 2), is \$50m less than the underground route. In our opinion, it is more probable than not that the Siting Board would not pass on this additional cost to electric rate payers. The concern then, would be that the petition would revert back to the overhead route based on our review of previous board decisions where the least cost option is chosen more often than not.

After studying the environmental impact of both MBTA ROW alternatives, Protect Sudbury concludes that the underground ROW alternative carries equally significant environmental risk to the Overhead ROW alternative. Specifically, the proposed underground ROW siting carries the following set of environmental concerns:

The threat of contamination to our water supply through disruption of the contaminated rail bed and deep trenching required within the Sudbury Zone 2 aquifer.

Permanent and lasting environmental damage. Specifically:

- Habitat fragmentation
- Destruction of protected historic structures

- Harmful effects to threatened and protected species of plants and animals
- Reduced shade cover for eastern brook trout and other aquatic species
- Destruction of documented Native American sites and artifacts

Further, there is significant doubt as to whether the underground route is buildable. Local experts have stated that it cannot be constructed. If Eversource attempted to build the underground route and insurmountable obstacles were encountered during construction, the construction method would most likely revert to an overhead approach.

Finally, there is major concern over the documented history of Eversource failing to comply with local by-laws as well as acting with complete and utter disregard to the rights of homeowners adjacent to existing rights of way. In their petition to the EFSB, Eversource requests exemption from all of Sudbury's and Hudson's local bylaws. These bylaws were created after careful thought and deliberation to protect citizens and businesses from projects such as this. The EFSB has the power to grant such exemptions. Protect Sudbury does not intend to turn over stewardship of these conservation lands to Eversource. Though they have expertise in transmitting energy and maximizing profits, they lack any track record of acting in the best interest of the communities they utilize to order to meet their corporate goals.