



## **Remarks from EFSB Public Hearing in Sudbury**

DEBBIE DINEEN, Sudbury Conservation Coordinator

CHARLIE RUSSO, Sudbury Conservation Commission

JULIE LIEBERMAN, Sudbury resident

RICHARD KANOFF, Protect Sudbury Counsel

RAY PHILLIPS, Protect Sudbury President

BILL SCHINELLER, Protect Sudbury Director, Government Relations

RENATA AYLWARD, Protect Sudbury Director, Communications and PR

JIM GISH, Protect Sudbury Director, Environment Liaison (hearing in Hudson;  
written remarks submitted)

**DEBBIE DINEEN**, Sudbury Conservation Coordinator

Facts from the Environmental Notification Form (ENF):

4.3 miles of Sudbury is along the MBTA rail line

5,930 linear feet are within in priority and estimated habitat areas for rare and endangered species

6,145 linear feet abuts protected town open space with public access

At least 8 perennial stream crossings

10 vernal pool - 5 certified and 5 with all the documentation collected for certification

ENF enumerates:

26.7 acres of trees will be cleared

12,962 square feet of fill will be placed in bordering vegetated wetland

13,794 square feet of other type of wetlands will be cleared of trees

Outside of bordering vegetated wetland, there will be, and this is a staggering figure, 756,436 square feet of tree clearing. That is over three quarters of a million square feet of trees cleared within wetland areas.

Think about that for a minute. That's staggering. It's staggering in a town the size of Sudbury. When you think about what that means, you'll realize that the vastness of that area to be cleared is in excess of 20 regulation size American football fields. That is unlike anything we have seen in this town before. The amount of permanent wetland fill exceeds 12.5 acres.

**\*\*Those wetlands provide free services that commissioner Russo was talking about. It maintains our drinking water quality. It prevents flooding. These are no small issues in Sudbury. These are huge. This is unprecedented destruction of our natural resources.\*\***

The conservation commission will be involved in the project in two diverse ways. First as a regulatory authority under the wetlands protection act and under our local bylaw. The threshold for disturbance for most types of projects is 5,000 square feet of alteration. This project far exceeds that. It is at least three times the maximum amount of permitted fill in a vegetated wetland.

**\*\*Again, this is unprecedented in Sudbury. There have been no wetland variances ever requested in Sudbury in the 40 plus years of wetland regulation in the state of Massachusetts.\*\***

Debbie Dineen, continued

Debbie Dineen, continued

The second form of involvement of the commission is as a direct abutter, representing all residents of the town. By definition, every resident here is an abutter because we all are the public who own our Hop Brook Conservation Land (Applause).

Our Hop Brook Marsh Conservation Land is a 93 acre parcel with flood plains, meadows and forest. It was purchased by the town in 1967. It was our first parcel of conservation land that we purchased. It is our flagship property. It's the most actively used of the town's conservation lands and abuts more residential properties in town than any other conservation land.

The commission believes that the alternatives within the MBTA rail line property is a significantly flawed alternative, above ground or below ground. We believe other alternatives exist that will have much less impact on abutting properties and natural resources and environmental values and functions of the area.

Sudbury is extremely fortunate to be bordered in several areas of town by not one, but two, national wildlife refuges. We are bordered on the east by our Great Meadows National Wildlife Refuge, and to the west and north by the Assabet River National Wildlife Refuge. These are irreplaceable federal resources that are there for the benefit of all humans, flora and fauna. The towns and the state and the federal government have worked for decades to expand on these protected parcels by working tirelessly to protect abutting lands.

We like electricity too. We don't envy your job at all. We understand that to have power there might be negative impacts within the communities. But we hope the siting board takes its responsibility seriously to look at options that provide needed facilities taking environmental protection as well as cost into account. And we hope you do that not only in Sudbury but also in placing facilities in other towns that might serve the electric needs of Sudbury as well.

We hope the board members had the opportunity to walk the right of way first hand. We wonder if you heard the barred owls calling. We wondered if you heard the ovenbirds with their rising crescendo of warning calls. Did you hear the thrushes? Did you get a glimpse of the red fox? This corridor is alive. it's not just a two dimensional line on a plan. We hope it's not to you. It's not to us.

This is our corner of the planet. It's under our care and protection. In the 1960s Sudbury fought Boston Edison for 9 years to prevent transmission line towers up Goodman's Hill Road and through the Great Meadows National Wildlife Refuge. There is a 115kilovolt line underground instead. We fought them, we won, we will fight again. This is worth it. Thank you.

**CHARLIE RUSSO:** Sudbury Conservation Commission member

In reviewing the ENF and the filing before the siting board I've noted a number of inconsistencies, omissions, and underestimates of the environmental impact that I think combined provide insufficient information for you guys to decide on the filing as it exists now per MGL 164. In fact I think the underlying methodology of much of the environmental impacts is flawed.

Specifically I'll call out page 4-25 of the application. The conservation land has been given a weighting in the evaluation matrix of 3 [out of 5] which is a mistake.

**\*\*Sudbury is fortunate to have a lot of federal, state, and local, conservation land and the MBTA right of way is the thread that links them all together.\*\***

To give a weighting of 3 when so much has already been invested by the federal state and local governments in preserving these spaces, really undervalues what has been invested in that property.

Developing the right of way would really break this linkage between these various conservation properties. I would also note that traffic mitigation has been given a weighting of 5, and what this does is it serves to skew the rankings of the environmental impacts. What this current weighting does is it prioritizes the avoidance of temporary traffic problems over the permanent alteration of existing conservation lands at the federal, state, and local level. That's a mistake. I think that methodology needs to be reevaluated from the start.

The ENF (Environmental Notification Filing), there are a number of issues I have with that in the first 29 pages. "To Be Determined" is the answer to standard questions 6 times. If an applicant came before the local conservation commission and had TBD as the response to a standard question every 5 pages, we'd make them start over.

The eight state interests of wetlands all boil down to human health. Just an example of one of the eight interests is flood control which I think is relevant to plans for a 9 mile underground high voltage electrical wire. The other one is drinking water supply and aquifer recharge. All these things ultimately do in fact affect human health.

**\*\*An effect on the wetlands is ultimately an effect on human health and the effect won't be localized. It's going to spread beyond the local area.\*\***

I am the con com's (conservation commission) representative on the Bruce Freeman Rail Trail Design Task Force and I can say rail trails when properly designed can be a nice sustainability benefit to a community, but despite the DCR's letter of support, to think that the MCRT should be cited as justification or mitigation for this project is a mistake.

Charlie Russo, continued

The DCR as its greenways project generally relies on local participation and enthusiasm to proceed with its projects and I think to assume that at this point is premature. The Mass Central Rail Trail should stand on its own merits, and I think tying it to this project or using that as a justification for this energy project is a misnomer.

Sudbury is a little different from some other communities in that we don't have sewers. We rely on well water, and while this project is probably not the straw that broke the camel's back and cause us big problems, we have an under road alternative, why add this straw? There is an option that could avoid all of this impacts.

If you look at the filing, the cold water fisheries impacts go from significant to NONE with the in road alternative. The tree clearing goes from significant to NONE. The conservation land impacts goes from significant to NONE. I urge you to choose the in road alternative as the preferred option.

**JULIE LIEBERMAN**, Resident

The starting point and basis for the ISO's Needs Assessment Study which led to this project is the 90/10 summer peak load forecast.

This is a forecast of extreme weather, the top 10<sup>th</sup> percentile in a distribution of annual peaks, such that this peak should occur in one year out of a 10-year forecast period. The 2009 Needs Assessment Study identified a reliability need for the Marlboro load pocket in 2013, based on a 2013 90/10 summer peak forecast of **6,460 MW**. Subsequent updates to the Needs Assessment Study continued to reflect year over year increases in these peak load forecasts despite declines in net energy load since 2008.

In reality, the ISO's peak load forecasts have not borne out, and as a result, its requirements upon which their studies are premised are grossly overstated. The highest peak in Boston over the past 10 years has been **5,803 MW** in 2011, a far cry below the original 2013 forecast of 6,460 MW.

This staggering divergence from reality grows substantially larger with the 2015 updated forecasts, pointing to a peak forecast of 7,210 MW for 2023.

Furthermore, Eversource attempts to confirm the need for this project in its Petition by using the same unrealistic peak load forecast data from the 2016 CELT Reports. These forecasts are also grossly overstated. The elephant in the room here is that Solar is barely factored into these forecasted peak requirements. Very little solar is cleared in the forward capacity market. This is of grave concern, since Solar is most productive on the hottest/sunniest days of the year, i.e. the same days that are creating the peak.

We are told that this project is needed, but what we've learned is that the system for identifying the need for transmission projects in New England is broken. As Massachusetts tries to lead the nation with progressive clean energy policies it is hindered by an ISO that has not adapted its planning processes to the new energy landscape. We should strive to effectively integrate non-transmission alternatives like storage, microgrids, and solar, into reliability solutions; and not force upon our communities, ill-conceived, outdated solutions to non-existent problems, that will no-doubt be rendered obsolete as the emerging energy landscape finds its footing and the ISO is forced to catch up.

For these reasons, I ask this Siting Board to rigorously challenge the embedded assumptions that have led the ISO and Eversource to conclude that this transmission line is warranted. This project is premised on a load that is so out of the range of reality that it doesn't even come close to the historic actual peaks over the last 10 years, refuting ISO's own definition of its 90/10 summer peak forecast. I ask that the EFSB order the parties to rerun the Needs Assessment Study with realistic peak forecast and installed solar capacity assumptions. The use of the

Julie Lieberman, continued

forward capacity market for a forecast of solar is a red herring as only 3% of installed solar capacity in New England has cleared the forward capacity market.

If after re-running the study, this project is still found to be necessary, it should be competitively evaluated against both transmission and non-transmission alternatives in accordance with FERC Order 1000. Lastly, if it is determined that this transmission line must be constructed in Sudbury, it should be constructed in Sudbury's commercial corridor, under Rt. 20, for the least long-term impact on Sudbury conservation lands and its citizens. I believe this is option 8 in Eversource's Petition, Table 4-6.

Thank you.

JULIE LIEBERMAN: Resident – exerpt, Peak Load Assessment process

What led to this project is a need that was triggered in 2013 for the 90/10 summer peak forecast. And it showed a forecast of 6,460MW.

Then what they do is they do stress testing of this extreme peak load forecast that takes out a critical element of the transmission system and says can you still get 6,460MW to flow? And then they take out \*another\* critical element of the transmission system to see if they can still get 6,460MW to flow through.

So our need was triggered by taking out two critical elements of the transmission system stress tested at a peak load of 6,460MW. And by that definition, you would expect to have seen 6,460MW some time in the last 10 years.

But when you look back over the last 10 years data for the Boston reliability area, which is the area we are talking about, the highest peak load occurred in 2011 and it was only 5,803MW.

So we're talking about a difference of 657 MW - that's like a gas fired generation plant going full bore.

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As Massachusetts leads the nation with progressive energy policies, it's hampered by the institutional processes of its ISO. We should be striving to integrate storage, solar, microgrid alternatives into reliability solutions, and not force upon our communities ill conceived, outdated solutions to non-existent problems that will be rendered obsolete as the emergent energy vision finds its footing and the ISO is forced to adapt.

The project is premised on a load that is so out of the range of reality that it doesn't even come close to the historic actual peaks over the last 10 years, far exceeding the ISO's own definition of its 90/10 summer peak forecast. The Needs Assessment Study should be rerun with realistic peak forecast and installed solar capacity assumptions.



**RICHARD KANOFF**, Legal Counsel to Protect Sudbury

Everything you've heard tonight is known to Eversource. They've been to these meetings in the past. They've been to meetings with Protect Sudbury. They've been to meetings with the Board of Selectmen, with members of the town. They've heard all the concerns that have been expressed here tonight. I don't think you would know that from what they've filed as a petition, but that's exactly what has happened over the past year. We expended as a town, as a group, a lot of energy communicating with Eversource about what would be best for Sudbury, appreciating what might be best for them as well. We talked about environmental concerns, about environmental impacts on the right of way, about impacts on wetlands, about impacts on rare species, about impacts on vernal pools. You've heard some of that tonight. We've talked about impacts on drinking water and on historical areas. About impacts from EMFs, from herbicides. We presented letters from elected officials about their concerns about the project. We've submitted materials from the federal fish and wildlife commission and many others. All of these talked about impacts of the project.

We also expressed concerns about property values to Eversource and impacts on tax revenues. Everything you've heard tonight, they've heard in the past. We explained that there were viable alternatives to the line as proposed with no effects on system reliability. The lights won't blink for a second. We know they won't; you know this as professionals. Not for a minute.

No matter what we said, no matter how united, no matter how deep our concern was for the town, no matter how passionate, Eversource would not budge. They proceeded to file the proposal that you have before you. The company made a choice to propose a ludicrous plan to put a transmission line in a non-utility corridor with a significant environmental, property and community impact.

I think if you look through some of the precedents that I know you will look through over time, you'll be hard pressed to find a proposal that was recommended for a non-utility corridor as opposed to a utility corridor. Almost every project that you've looked at was in a utility corridor. It's rare, if not unique, to have a proposal such as this where other options exist. And I think that's an important point for you all to consider.

In making its decision, Eversource bet that this town, and Protect Sudbury, would go away, would give up. They failed to understand that the town and its citizens would unite to fight this project. You've heard that tonight as well. They failed to see that this town would vote unanimously in opposition to this proposal at town meetings. They bet against the power of funding drives, selling T-shirts, (did you all buy one), signs, social media, and political action. In short, Eversource underestimated the town, its commitment to the environment, to common sense, to its kids, and to its future. This is obvious. It was obvious tonight. It's obvious to me. It's obvious to you. It's obvious to everyone here.

Richard Kanoff, continued

The company made another bet. And this is more substantive. They bet that you, the siting board would approve the proposal. After all, they're a big utility and they're used to getting what they want. They bet in this filing against your professionalism, against your judgement, and against your commitment to the public interest. And that's a bad bet too. It assumes that the siting board would accept outdated and unreliable analysis undertaken by ISO NE and the company. It assumes that the siting board won't evaluate the National Grid alternative in detail. It assumes that the siting board won't send this proposal back to the ISO for more evaluation. And it assumes that the siting board will accept the company's claim that a transmission line in a non-utility corridor is better than an upgrade of an existing utility right of way or better than an under street option.

We think you will agree that the company made a bad bet. We're confident, following your review, that you will determine that Eversource picked the wrong location and the wrong solution and that this proposal should be rejected. Thank you very much.

**RAY PHILLIPS**, President Protect Sudbury

I'm here this evening both as a private citizen and as president of Protect Sudbury. The process for awarding energy projects is fatally flawed when the burden of proof is placed upon a community in the eleventh hour of a process that began in 2008.

The process is broken when proposed project designs are decided by ISO New England strictly on the basis of construction cost alone, construction costs that historically have been over budget by as much as 79% from their initial estimated cost.

The process is broken when environmental impacts are evaluated qualitatively and the real cost of the damage to property, environment, and health and safety of residents is never objectively quantified. Instead the petitioner can formulate their own evaluation criteria, bias it toward their desired outcome and form conclusions based on incomplete and inaccurate accounting.

The process is broken when non-reliability factors such as a five million dollar annual windfall to Hudson Power and Light, a nine million dollar funding to a cash strapped MBTA, and the influence of an underfunded and overcommitted department of conservation and recreation are introduced into the decision making process. These are factors that have absolutely nothing to do with reliability, but everything to do with back room deals and hand shake agreements. Agreements that may look like win win for the participating parties but are absolutely a lose lose for the citizens of Sudbury (applause).

While technically the petitioner is considered a public utility, I would argue that their public responsibility is now, at best, an after thought. They are first and foremost a for-profit, multibillion dollar corporation, yet they are still afforded the special rights and privileges of a publicly responsible institution. Rights which allow them to request and potentially obtain a complete and total variance from our town's bylaws and zoning requirements. These are the very same bylaws that this community has put into place to protect us from the adverse effects of projects such as this one.

My cynicism and skepticism is founded upon my firsthand experience with the petitioner. A corporation that acknowledges the wishes and desires of citizens with their lips then walks out the door, only to deny them through their actions. This is what an unbelieving community simply finds unbelievable. If one were to construct a list of the key factors that would constitute the most undesirable location for a new transmission line, it might look something like this. It would cause permanent and lasting damage to protected and environmentally sensitive areas. It would be located in densely populated residential areas to maximize the danger to public health and safety. It would be sited through historic sections of an historic community so to forever change the character of that community. It would pose a threat to the town's drinking supply and finally it would cause long term damage to

Ray Phillips, continued

the local economy and cause unrecoverable financial losses to both businesses and home owners. And yet these are in fact the key characteristics of the petitioner's so called preferred siting.

My final point is about the people. The people that will be most impacted by this project. They are the home owners and the businesses the people use our water supply, the people who enjoy the use of our unspoiled conservation areas. Those people, these people are here this evening because they care and are concerned about this petition before you. Sudbury will not go quietly into the night. We have no intention of turning over the stewardship of our conservation lands to a company with expertise in transmitting energy and maximizing profits but with no track record of acting in the best interest of the communities they trample through in order to meet their corporate profitability goals.

This community is fighting for something though much more important than a transmission line. We are fighting for the fundamental rights that have defined the community since incorporation in 1632. We are fighting for the right of home rule and self determination. These are the values that our country was founded upon and these are the same values that Sudbury has fought for throughout its history. And we don't intend to stop now.

**BILL SCHINELLER**, Director, Government Lead, Protect Sudbury  
Good evening Energy Facilities Siting Board and welcome to Sudbury.  
My name is Bill Schineller. Officially I am an abutter, but my property does NOT directly abut Eversource's preferred route.

First a poem: "I went into the woods because I wished... to pick a site for a transmission line," wrote Henry David Thoreau – never. But he did walk in these woods and canoe in our rivers, and I invite you to as well.

Reading Eversource's petition, I have tried to put myself in their shoes. To have to produce an analysis to justify a pre-determined answer. A solution in search of a problem. Eversource has told Wall Street the answer to their growth is the lucrative electric transmission business. In 2012, they told ISO-NE that the answer to a predicted reliability problem in this region, at lowest cost, is a new transmission line.

Now, in 2017, Eversource must justify that answer to you, the Siting Board, in terms of Reliability, Cost, AND the Environment. When the realities didn't fit their answer, they have changed the question.

At a meeting with Eversource last Fall, their hired VHB consultant, Marc Bergeron, looked me in the eye and said: "We acknowledge there are permanent, negative, environmental impacts present along the MBTA corridor that are not present with an under street route." Immediately, Eversource VP Jim Hunt cut in, saying "But on balance, we believe that the MBTA RoW solution is best for the region."

It seems now that the Regional benefit Eversource is using to justify their solution on the MBTA corridor is not a reliability benefit.  
Instead they propose to :

- provide "\$9M in much-needed operating revenue to sustain the MBTA's train and bus system"
- assist the under-funded Department of Conservation and Recreation with development of the regional Mass Central Rail Trail

To justify their solution, they have changed the problem from reliability to addressing public funding issues.

Here are more examples of Eversource taking poetic license:

- To make street routes look bad, they invent a scoring system which redefines the Environment as traffic disruption during construction
- To make National Grid's alternative look bad, they calculate its environmental impact as if it involved a brand new corridor. In fact, that alternative upgrades existing lines, with close to zero incremental environmental impact.

Bill Schineller, continued

- Conversely, to make Eversource's proposed MBTA option look less bad, they calculate only its incremental impact, relative to clearing of a future rail trail.
- Every estimated cost is expressed with a 75% margin of error, so the National Grid alternative, and the under-street alternatives may well cost LESS than preferred underground MBTA route, even using Eversource's data.

The reliability need justifying this project was for a theoretical load peak that may occur on one day in 10 years. That is the problem ISO asked for a solution to. Not any other problem. Eversource is proposing to stick a giant square peg to plug a tiny round hole in the grid.

Members of the Siting Board, we put our trust in you to review the Petition, and hear testimony, with critical eyes and ears. Here is my sincere request: If Eversource has provided you an inappropriate solution to an invented or obsolete problem, then please exercise your authority and send this back to ISO-NE.

If the reliability need is real and present, then please choose a solution which avoids permanent loss of our natural resources, and instead pick one which utilizes existing utility corridors.

In closing, I would like to paraphrase Doctor of Humane Letters, David Ortiz: "This is our effing Town!" It's beautiful. Please help us protect Sudbury. Thank you.

**RENATA AYLWARD:** Director PR & Communications, Protect Sudbury

You asked about our concerns and I have many. My first concern is that up until this point, the entire process favors the petitioner and hamstring the community.

My second concern is Eversource. We have dozens of communities already fighting Eversource transmission lines, substation placements, tree clear cutting and removal, herbicide spraying, threats to water supplies, and the visual, noise, and environmental pollution that comes with their energy projects.

If you have not yet seen the website [StopEversource.com](http://StopEversource.com), you should take a look. There you will see many towns that have banded together to form a coalition against this one company and the way it does business. Literally tens of thousands of citizens across New England fighting this one company, Eversource, and their energy projects that trample communities and the environment.

It is time to stand up today. And we stand with other communities fighting Eversource. Needham, Brewster, Dennis, Orleans, Eastham, Provincetown, Wellfleet, Yarmouth, Martha's Vineyard, East Boston, Chelsea, Durham NH, Hudson, Marlboro, and Stow, as they try to repair the damage already done, prevent further damage, or like Sudbury, trying to stop it from ever occurring.

In the life of every problem there is a moment when the problem is big enough to see and small enough to still fix. This is that moment.

The future of the commonwealth need not include a spider web of transmission lines criss-crossing the state with scorched earth below. And their underground route is no less devastating to our conservation areas, as you know and the to protected species of plants and animals within it. You have the opportunity to reject this petition and stand with a community.

Our neighbors in South Sudbury have already had to deal with unannounced and poorly managed capacity upgrades in the existing Eversource right of way in that part of our town and Eversource shows no improvement in their behavior towards our community.

In fact, in the meeting in October 2016, abutters in the neighborhoods got notice of that meeting 3 days AFTER the meeting had happened. That's their track record. And it's not just this community, which is why Protect Sudbury fights for Sudbury, as well as Hudson, and Stow, and Marlboro, working to change the laws so that this doesn't happen to anybody or any community ever again.

Eversource's word is worthless, their project is needless, and their cost estimates baseless. Our conservation land, however, is priceless. And you have an opportunity to help us protect it.

I ask that reject this petition in all its forms. Do not let them have the right of way.

**Chris Hamilton**, Director, Protect Sudbury Legal Team

I want to thank you for being here to listen to our community. In the interest of full disclosure, I am also an attorney representing Protect Sudbury in a related matter against the MBTA in Suffolk Superior Court. My statement this evening pertains to the proposed public/private partnership between Eversource, a for-profit corporation and the MBTA, and the Department of Conservation & Recreation (both agencies of the Commonwealth). I would encourage and urge the EFSB to closely scrutinize how this cost sharing proposal actually may allow agencies to avoid compliance with statutes designed to protect our environment and our pocket books and allow our community to participate in the construction of projects.

For example, if DCR were to install a trail without piggy backing on Eversource's wanton destruction of our right of way, they would be subject to the full panoply of environmental regulations designed to protect our environment and provide community input as to how the project would proceed. Our community could rest assured then, that our wetlands, our neighborhoods, and our conservation areas were being protected and looked after. Unfortunately, when "piggy backing" or "bundling" the trail with an Eversource project, this trail project can hide under the cloak of the numerous zoning and environmental exemptions provided to the utility.

Further, Eversource would be allowed to transfer the costs of this underlying foundation of the trail and other preparatory construction to the electric rate payers, which I would argue is inappropriate and wholly unrelated to the delivery of power.

In essence, Eversource is attempting to use this artifice of a trail as a siren song to entice our cash strapped agencies and members of our community to abandon their obligations of stewardship of our neighborhoods and conservation areas. And tonight I implore you, please do not allow this to happen.



**JIM GISH**, Director, Environmental Outreach (written comments)

Thank you, Mr. August and other members of the EFSB for being here tonight to listen to our concerns. We are counting on your expertise and commitment to making a responsible decision, and not just one that favors the utility company but is in the best interest of the citizens, present and future, of the Commonwealth that you were appointed to serve.

At the last public hearing in Sudbury on May 25<sup>th</sup>, many issues were raised, and some of them quite emotional, however, I hope you noted that the vast majority of citizens were not just passionate about their opposition to this proposal, but extremely well-informed about the facts and the details of the proposed project and its ramifications. The citizens of Sudbury and Hudson are well-educated, organized and have carefully researched this project and the potential deleterious impacts on our environment, health and safety, property values and character of our towns.

We are united in our opposition to any siting of a transmission line along the MBTA corridor. We, in fact, based on our analysis, have concluded that the underlying assumptions as stated by ISO-NE and Eversource that form the justification for this project, are no longer valid and that the project is thus not necessary. However, if after scrutiny of the analysis and careful consideration, you believe that it is needed and the alternate proposal by National Grid for upgrade of other facilities is not appropriate, we respectfully and strongly ask that you select an under-street route along Route 20 – an existing utility corridor.

A very few people have claimed that this opposition is by a small group of abutters who don't want the project in their backyards. There are indeed abutters, and this is of most concern to them, however, there are over 3000 people who have joined the opposition, including people in other communities throughout the region who have been fighting similar battles. As a clear indication of the level of support throughout Sudbury, at last year's Annual Town Meeting, with a packed auditorium and packed overflow room, there was a unanimous vote to expend \$185,000 on legal fees to oppose this project. At this year's meeting, there was a unanimous vote to expend \$200,000. This is a town-wide concern, and not simply that of a handful of abutters.

I will shortly be sending you a packet of letters received by environmental and community groups throughout the state indicating their opposition to this project. Please pay particular attention to the details of their concerns. Among the groups represented are the Sierra Club, Environmental League of Massachusetts, the Sudbury Valley Trustees, Mass. Audubon, US Fish and Wildlife, Friends of the Assabet National Wildlife Refuge, and others. Also included are letters from our Massachusetts and US senators, Massachusetts representatives and US congress people. You will clear see how broad-based the opposition is to this project.

I would like to highlight just one aspect which was briefly touched on in the first public hearing. That is, the impact of lost trees. Whether we're talking about above-ground or below-ground along the MBTA ROW the tree loss from the clearcutting will be in the tens of thousands. There are multiple impacts of this tree removal. It will result in habitat loss and fragmentation which will impact the flora and fauna—some of which are on the NHESP list--in the multiple conservation lands as well as throughout the town. It will be increasing the carbon load of the area at a time when every tree counts as we battle to fight global climate change. It could result in temperature increases that would harm the trout that are reemerging in the waterways. The trees are integral part of our local hydrology. Just as a point of reference, we removed a large tree between our house and our neighbors a few years ago when we added a second garage. We never had water in our house prior to taking that tree out, but afterwards we had year-round issues that resulted in us spending \$12,000 to solve. Just imagine the flooding problems we could have with surrounding houses if we wipe out tens of thousands of trees. Last, but not least, is the impact that much tree loss would have on the beauty and serenity of the town. It's simply unimaginable and unacceptable.

The good news is that the reliability needs can be met without any environmental impacts, simply by upgrading existing facilities or by putting the transmission line under our streets. Also, it seems likely that the petitioner has understated their cost estimates for the MBTA routes while padding their under-street option, at least based on the analysis we've done of comparable completed construction costs elsewhere.

In summary, I ask that you scrutinize this filing to the best of your ability and don't give Eversource the right-of-way.

Thank you