



July 4, 2017

Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs
Attn: Page Czepiga, MEPA Office
100 Cambridge Street, Suite 900
Boston, Massachusetts 02114

Re: EOEEA # 15703 Sudbury-Hudson Transmission Reliability Project ENF

Dear Secretary Beaton:

The Department of Conservation and Recreation (“DCR” or “Department”) has reviewed the Environmental Notification Form (“ENF”) submitted by Eversource (the “Proponent”) for its Sudbury-Hudson Transmission Reliability Project (the “Project”).

As stated in the ENF, the Project will construct, operate, and maintain a new 115-kV underground electric transmission line for a 9-mile section between substations in Sudbury and Hudson. Approximately 6.7 miles will be constructed within the right-of-way of an abandoned railroad line owned by the Massachusetts Bay Transit Authority (“MBTA”). The Proponent is also proposing to conduct improvements to the two substations to accommodate the new line. The transmission line is intended to address identified thermal and voltage problems, and help meet electric demand.

In 2010, DCR obtained a lease over 23 miles of the MBTA corridor through the towns of Sudbury, Wayland, Weston, and Waltham to develop a portion of the Mass Central Rail Trail (“MCRT”). The Project as proposed will facilitate development of the 6.7-mile stretch of the MCRT. DCR understands the Proponent holds an existing easement and will obtain other rights from the MBTA to allow for the underground construction of the line and project-related work along a portion of the same corridor.

DCR submits the following comments in response to the proposal:

Mass Central Rail Trail

The Mass Central Rail Trail will provide a multi-use pathway from Boston to Northampton, along a former railroad corridor. The development of a multi-use rail trail in the Sudbury area will provide the missing link in the regional MCRT from downtown Sudbury past New England farmland and forests, to the Assabet River Rail Trail in Hudson and the Bruce Freeman Rail Trail. The MCRT presents a unique opportunity to provide public open space, promote regional connectivity and local commerce, encourage outdoor recreation and the health benefits derived therefrom, and inspire environmental and historic appreciation.

The Proponent will construct the gravel base of the MCRT in conjunction with the construction of the transmission line, to conform to DCR standards for rail trails. Later, DCR would construct the paved

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Office of Energy & Environmental Affairs

Karyn E. Polito
Lt. Governor

Leo Roy, Commissioner
Department of Conservation & Recreation

surface and related improvements on the gravel base, after which this section of the MCRT could be opened to the general public. The Proponent will also reinforce three bridges that cross waterbodies along the corridor. DCR and the Proponent intend to execute a Memorandum of Understanding ("MOU") to outline roles and responsibilities for permitting and construction for the MCRT-related aspect of the Project to be implemented by the Proponent. DCR will work with the Proponent to realize the public's use of the MCRT as a multi-use pathway for pedestrians and non-motorized bicycles, and believes it will result in substantial cost savings to the Commonwealth. DCR supports the proposed underground option, as it will greatly maintain the scenic and aesthetic qualities of the MCRT. DCR's mission includes the conservation of our natural, cultural and historic resources. We appreciate that this Project goes through some environmentally sensitive areas, such as the Hop Brook Corridor, and urges the Proponent to take all reasonable steps to protect these resources during the design and construction of this Project.

Thank you for the opportunity to comment on the FEIR. If you have questions regarding our comments please contact Paul Jahnige at 413-586-8706 ext. 21 or paul.jahnige@state.ma.us.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Leo Roy', is written over the printed name.

Leo Roy
Commissioner

cc: Patrice Kish, Tom LaRosa (DCR)