



June 12, 2017

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Page Czepiga, EEA No. 15703
100 Cambridge Street, Suite 900
Boston MA 02114
Page.Czepiga@state.ma.us

In the matter of the Eversource Sudbury-Hudson transmission line project, I'd like to raise the following issues:

- 1) Given the last-minute submission by Eversource of a "corrected" ENF, we request a thirty day extension to the comment period to allow for preparation of an adequate response to this significant change in the filing.
- 2) The only ENF filed is for the "preferred" option, i.e. the MBTA ROW underground transmission line. However, there are two other options listed in the filing to the EFSB, the aboveground MBTA ROW route, and an under-street route. Both of these routes should also be subject to the filing of an ENF and EIR.

No engineering plans for the route have been presented and the underground option is likely to be unbuildable because the rail bed often alternates between elevation and depression of upwards of 15 feet. Furthermore, the duct bank would have to be offset from the rail bed, requiring extensive fill or blasting to provide the platform for the underground line. Because of these complications, we are concerned that the EFSB may further consider the aboveground line. The aboveground option has substantially more environmental impacts than that in the current ENF and because it has not been ruled out, either by Eversource or the EFSB, Eversource should be required to file an ENF and EIR for it. Similarly, by not filing an ENF for the under-street route, which has virtually no environmental impacts, no formal statement of impact will be on record with MEPA with which to compare the existing filing. By their own statements in the EFSB filing, Eversource has said the under-street route has virtually no environmental impact, and evaluation of the current filing should take that into consideration.

- 3) Note, in particular, that no details have been given with respect to the means by which the transmission line will be constructed through the water crossings. This is of particular concern, due to the potential for harm to species present and to the impact on existing recreational uses such as boating, hiking, and horseback riding. A raised duct configuration was mentioned during the site visit, but what are the advantages and disadvantages of that from an environmental impact standpoint relative to alternatives such as horizontal-direction drilling? Will the lines at these crossings be well-shielded to prevent EMF exposure during recreational use?
- 4) The site visit today underplays the significant impact had by this project and only looked at a very small part along the impacted route. I urge MEPA to conduct a more thorough examination of the entire route, accompanied by the Sudbury Conservation Commission. Given that there are more viable under-street options and the option of expanding existing facilities, we further urge MEPA to question the underground route in the larger context of whether this route should be granted further consideration at all, and instead just be rejected outright.

The following concerns have been raised by a number of environmental organizations, including Mass. Audubon, Mass. Chapter of the Sierra Club, Sudbury Valley Trustees, Environmental League of Massachusetts, Clean Water Action, US Dept. of the Interior, and others. Some of these organizations will be submitting their own comments.

- 1) Wildlife habitat fragmentation of one of the region's largest natural areas, including five different conservation lands, including Assabet River National Wildlife Refuge, Marlboro-Sudbury State Forest, Sudbury Valley Trustees Memorial Forest, and Hop Brook Marsh Conservation Land and Marlborough Desert Natural Area. The majority of the areas are part of NHESP priority habitat (PH 687). These areas harbor diverse wildlife with several different habitat types and is home to several threatened and endangered species of plants and animals. (USFWS, Audubon, Marlborough Con Comm)

Among the species at risk are salamanders, Blanding's turtles, wood turtles, Eastern Box Turtle, Eastern Brook Trout, and the recently state-listed whip-poor-will.

There are sensitive habits within the above: wetlands, vernal pools, turtle nesting sites, and cold water streams.

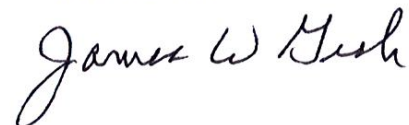
- a. Potential for creating conditions unsuitable for certain wildlife species
 - b. Allows for an increase in invasive species and a pathway for predators (USFWS, SVT)
 - c. Large, interconnected areas of forestland and wetlands are vital for ecological health and integrity.
 - d. Destruction of unusual plant populations
 - e. Disturbance and alteration of breeding habitat of recently state-listed whip-poor-will
- 2) Large-scale permanent destruction of conservation lands (ELM, SVT)

- a. Irreparable immediate and ongoing damage by construction and maintenance (ELM, SVT)
- 3) Impacts from the use of detrimental herbicides to environmentally sensitive *areas* (USFWS, SVT)
- 4) Potential for ground-water pollution from dangerous herbicides
 - a. Although both the state and US EPA have approved glyphosate and other herbicides for use, there is growing evidence for both human impact in the form of cancer by international bodies and the World Health Organization. We can't risk taking a chance with the health of the population of the impacted towns.
 - b. There is also considerable research on the impacts of glyphosate on threatened and endangered species, particularly amphibians such as the salamanders found all along the route. (See References at the bottom of this letter).
 - c. The proposed route is in close proximity to five certified (and five with certified data collected) vernal pools containing the species in question
- 5) Likely increase of unauthorized uses of ATVs and dirt bikes which causes significant damage to the natural resources (USFWS, SVT)
- 6) Destruction and/or contamination of highly important water resources important to humans and wildlife (CWA,OARS)
 - a. Impact on threatened and vulnerable Eastern brook trout habitat in the Sudbury River tributaries by diminishing shade cover, warming of river temperatures and potential pollution from herbicide usage.
 - b. The proposed transmission line crosses over Zone II areas in Sudbury and the Cranberry Bog Well in Hudson. Potential pollution by any herbicides in these areas is unacceptable. As stated above, recent research has shown that run off of glyphosate into water resource areas can and does happen.
 - c. Disruption of existing contaminants from previous rail line use is likely to impact these water resources. It is not uncommon to find arsenic, creosote and other hazardous chemicals in old rail beds. Flattening the rail bed and removing old railroad ties for clear-cutting will disturb these contaminants and has a high risk of dispersing them into the surrounding water resources.
- 7) Mitigation of these impacts is not feasible. (Audubon)

Given the scale and severity of these impacts, a permit for this project should be denied. Barring that, at the very least, an EIR should address all of the above concerns. In addition, all items marked TBD in the ENF need to be fleshed out in detail.

Thank you,

James W. Gish



Director, Environmental and
Community Groups Liaison
Protect Sudbury, Inc.

35 Rolling Ln
Sudbury, MA 01776
jgish@protectsudbury.org

Quotes from letters of support (attached):

George Bachrach, Environmental League of Mass.
Lisa Vernegaard, Sudbury Valley Trustees

“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. Eversource did not accurately consider the environmental impacts of its Preferred Routes when evaluating the three options and the Environmental League of Massachusetts believes that the permanent damage to topography, wildlife, and vegetation in this unique area cannot be understated.”

Lisa adds:

“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.

Becky Smith, Clean Water Action

“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.”

Emily Norton, Massachusetts Sierra Club

“As wild lands, wildlife, recreation areas, and historic districts are increasingly at risk in our country, our obligation to current and future citizens is to do everything in our power to ensure that we preserve every precious natural resource that we currently enjoy. We understand that Eversource is putting forth the above-ground line as a “lowest” cost proposal. We believe, to the contrary, that it and any other route through conservation lands represents the highest-cost proposal and should be discarded. We cannot afford to

dismiss the consequences of failing to ignore the value to humankind of unbroken forest and wetlands, wildlife and clean water.”

John Clarke, Mass. Audubon

“In calculating the costs of constructing lines through and adjacent to protected lands, the full costs and availability (or lack thereof) of mitigation lands of equivalent natural resource value must also be considered. The Executive Office of Energy and Environmental Affairs’ policy on disposition of lands protected under Article 97 of the state Constitution requires not merely consideration of the market value of the impacted lands but also the natural resource value. In rapidly developing suburbs such as Sudbury and Hudson, land available for replacement conservation is limited, and it is not feasible to fully mitigate for the fragmentation effects on large blocks of woodland.”

Some recent findings on Glyphosate

- Although glyphosate has not traditionally considered to be an issue for ground-water pollution because it often binds to soil, Danish researchers have found that in some soils and some settings, there is considerable potential for finding its way into drinking water. This may be directly through the soil -- depending on soil type -- or via runoff following rainstorms, into streams, rivers, sewer systems, etc.
- Of the wells tested in the Danish study, glyphosate was found in 8.8% of the wells tested, with 3.4% exceeding the drinking water limit.
- Glyphosate is being detected in both surface and groundwater wherever it is used!

Effects on amphibians

- Growing body of evidence showing increased mortality, growth abnormalities in frogs, toads, salamanders. Despite evidence neither the EU nor the US regulators require direct testing

Effects on aquatic and marine organisms

- Toxic impacts on micro-organisms and further up the food chain on freshwater mussels, for example.
- Freshwater carp showed changes to liver cells and mitochondria at levels 5% and 10% of that expected from normal agricultural practices.
- DNA damage has been observed in exposed fish.
- Evidence of effects on the enzyme acetyl-cholinesterase, vital for proper nerve functioning, resulting in serious health problems and death in brown mussels and eel.

Endocrine disruption

- Evidence of glyphosate and Roundup may be linked to endocrine disruption in animals and human cells.

Questions

- Why do people in countries where glyphosate is used have it in their urine?
- Why isn't testing required for glyphosate in food, feed or water?
- Why isn't testing required for glyphosates in humans?
- Why are there no studies of long-term health consequences for humans?

References (available upon request)

Relyea, R. A. 2012. New effects of Roundup® on amphibians: Predators reduce herbicide mortality while herbicides induce anti-predator morphology. *Ecological Applications* 22:634-647.

Relyea, R. A. 2011. Amphibians are not ready for Roundup®. Pages 267-300 in J. Elliott, C. Bishop, and C. Morrisey, eds. *Wildlife Ecotoxicology—Forensic Approaches*. Springer.

Jones, D. K., J. R. Hammond, and R. A. Relyea. 2011. Competitive stress can make the herbicide Roundup® more deadly to larval amphibians. *Environmental Toxicology and Chemistry* 2:446-454.

Jones, D. K., J. I. Hammond, and R.A. Relyea. 2010. Roundup® and amphibians: The importance of concentration, application time, and stratification. *Environmental Toxicology and Chemistry* 29:2016-2025.

Relyea, R. A. 2005. The lethal impacts of Roundup and predatory stress on six species of North American tadpoles. *Archives of Environmental Contamination and Toxicology* 48:351-357.

Relyea, R. A., and D. K. Jones. 2009. The toxicity of Roundup Original MAX® to 13 species of larval amphibians. *Environmental Toxicology and Chemistry* 28:2004-2008.

Relyea, R. A. 2005. The lethal impact of Roundup® on aquatic and terrestrial amphibians. *Ecological Applications* 15:1118-1124.



City of Marlborough Conservation Commission

140 Main Street
Marlborough, Massachusetts 01752
Tel. (508) 460-3768 Facsimile (508) 460-3747

Edward Clancy - Chairman
Allan White
Lawrence Roy
David Williams
Dennis Demers
John Skarin
Karin Paquin

Priscilla Ryder Conservation Officer

March 30, 2016

Bev Schultz
Eversource Project Manager
One NSTAR Way
Westwood, MA 02090

RE: Hudson to Sudbury Transmission Line Project

Dear Ms. Schultz,

At its meeting on March 24, 2016 the Marlborough Conservation Commission reviewed the Eversource material presented at the Open House you held in Hudson on March 15, 2016 and have the following comments:

The electric power line proposal along the Central Mass rail line would pass by the corner of the Desert Natural Area which is a 900-acre parcel of various conservation lands managed and owned by 5 different entities: State DCR; Federal ARNWR; private Sudbury Valley Trustees land trust; Greater Federation of Women's Clubs; and municipal- Marlborough and Sudbury Conservation Commissions.


Our main concern with this transmission line proposal, although not in Marlborough proper, is that it will bisect a large area which has contiguous open space and harbors diverse wildlife with several different habitat types within its boundaries. It is home to several threatened and endangered species of animals and plants which we have worked hard to protect over the years. A large clear cut of trees along the railroad corridor which was described as being up to 80+ feet wide would change the dynamics of this sensitive area considerably. The ongoing maintenance and clearing required to maintain the above ground lines would also have long term impacts to this habitat area. Therefore, we would be opposed to an above ground transmission line for these reasons.

We know the project is in its conceptual phase at the moment and ask that you take these issues into consideration as you deliberate on the various options that were presented and work to avoid impacts to this important wildlife habitat area.

Page 2

As an abutter to the rail line we would like to be kept informed on this proposal as it moves forward. Please add us to any mailing list regarding this project.

Sincerely,


Edward Clancy
Chairman

e-mail:

Mayor Vigeant

City Council

Marlborough, Hudson and Sudbury Conservation Commission;

Libby Herland, ARNWR

Michael Waterman, DCR

Lisa Vernegaard, SVT

Joanne O'Leary and Mark Kimball, Eversource



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.



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

Dear Governor Baker:

We join with Mass Audubon, the Sierra Club, the Sudbury Valley Trustees, and the town of Sudbury in opposing both Preferred Routes highlighted in the Eversource proposal to construct a new 115 kV power line between Sudbury and Hudson. We strongly favor a below-ground street-based alternative route that would bypass the natural areas that the current Preferred Routes put at risk.

Eversource's proposal includes a street-based option as its Noticed Alternative Route, but still highlights the MBTA right-of-way as its Preferred Route with two options; an above ground design and a below ground design. We are:

- In strong support of a street-based route which Eversource has acknowledged to have minimal environmental impacts.
- Strongly opposed to the above-ground option following the MBTA right-of-way due to the unacceptable destruction to conservation areas.
- Strongly opposed to a below-ground option following the right-of-way due to the irreparable damage that construction and maintenance will have on the conservation 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. Eversource did not accurately consider the environmental impacts of its Preferred Routes when evaluating the three options and the Environmental League of Massachusetts believes that the permanent damage to topography, wildlife, and vegetation in this unique area cannot be understated.

We ask you to urge Eversource to table both Preferred Routes using the MBTA right-of-way and proceed only with the Alternative Route under existing streets.

Sincerely,

George Bachrach
President

cc. Secretary Matt Beaton



Friends of the Assabet River National Wildlife Refuge

*Working with the United States Fish and Wildlife Service
And serving our local communities*

August 14, 2016

Ms. Beverly Shultz
Project Manager
Eversource
One NSTAR Way
Westwood, MA 02090

Dear Ms. Shultz:

I write this letter in support of the June 28, 2016 letter from Elizabeth A. Herland, Wildlife Refuge Manager for the Eastern Massachusetts National Wildlife Refuge Complex ("the Refuge"), and as the President of the Friends of the Assabet River National Wildlife Refuge ("the Friends"). As an organization that works for the betterment and sustainability of the Refuge, we strongly oppose the plan for the new 115 kV above ground power line between Sudbury and Hudson. We believe that power lines should be installed underground along existing roadways so as to lessen the deleterious effects the lines will have on the Refuge, its wildlife, and its visitors.

The Friends is a non-profit organization of volunteers who work with the US Fish and Wildlife Service to protect and enhance the Refuge's flora and fauna. We engage community and other stakeholders to promote maximum use and enjoyment of the Refuge for the surrounding communities while balancing those benefits with the primary goal of protecting its natural resources. Through stewardship activities, education and outreach programs, the Friends work to ensure the Refuge's valuable resources are available for the enjoyment and education of present and future generations. On a monthly basis, the Friends reach out to over 200 members and another 10,000 non-members through emails, programs and seminars.

The Refuge is a remarkably prized resource to Eastern Massachusetts, and in particular to the surrounding communities of Maynard, Hudson, Marlboro, Stow, and Sudbury. These communities would be directly affected by the plan to cut the 82-foot wide transmission corridor along the MBTA abandoned rail line to accommodate large overhead towers and transmission lines. Residents of these and other nearby cities and towns are Friends members and volunteers who have spent years helping to clear and prepare the land to be a better sanctuary for native animals, birds, fish and over 650 plants species. They send their children to Refuge programs to learn about the environment, and to nurture and release endangered Blanding's turtles back into the wild. The proposed corridor would disrupt the natural beauty of the Refuge and impact its plants and wildlife.

I wholeheartedly urge you to save the Refuge's revived pristine beauty and habitat from the adverse effect of Eversource's plan for overhead transmission lines by considering an underground alternative.

Sincerely,

David Manjarrez
President



Friends of the Assabet River National Wildlife Refuge

*Working with the United States Fish and Wildlife Service
And serving our local communities*

Friends of the Assabet River National Wildlife Refuge

P.O. Box 27, Hudson, MA 01749-0027

WEB: www.FARNWR.org EMAIL: info@farnwr.org

CC:

U.S. Senator Elizabeth Warren
U.S. Senator Edward Markey
U.S. Congresswoman Niki Tsongas
U.S. Congresswoman Katherine Clark
Governor Charlie Baker
Matthew Beaton, Secretary MA EOEAA
George Peterson, Commissioner Department of Fish and Game
Leo Roy, Commissioner, MA Department of Conservation and Recreation
Mark Boyle, MBTA
State Senator Jamie Eldridge
State Senator Michael Barrett
State Representative Carmine Gentile
State Representative Danielle Gregoire
State Representative Kate Hogan
Melissa Murphy Rodrigues, Sudbury Town Manager
Tome Moses, Executive Assistant, Hudson
Arthur Vigeant, Mary, City of Marlborough
Elizabeth A. Herland, Wildlife Refuge Manager for the Eastern Massachusetts National Wildlife

Refuge Complex

Lisa Vernegaard, Executive Director, Sudbury Valley Trustees
Elfriede Parker, Acting President, General Federation of Women's Clubs of Massachusetts
Leslie G. Hamilton, Protect Sudbury
Jennifer Krowchun, O'Neill and Associates
Beverly O'Leary, Eversource
Mark Kimball, Eversource
David Manjarrez, President, Friends of the Assabet River National Wildlife Refuge
Karen Lund, Treasurer, Friends of the Assabet River National Wildlife Refuge
Kalisa Barratt, Clerk, Friends of the Assabet River National Wildlife Refuge
David Molzan, Director, Friends of the Assabet River National Wildlife Refuge
David Williams, Director, Friends of the Assabet River National Wildlife Refuge
Jan Wright, Director, Friends of the Assabet River National Wildlife Refuge
Joe Fernandez, Director, Friends of the Assabet River National Wildlife Refuge

Dear Governor Baker,

I am writing on behalf of the residents of Sudbury who are seeking your help. Eversource is planning to use the MBTA right-of-way to run high voltage powerlines through Sudbury and Hudson neighborhoods. This will cause irreparable damage to the conservation land and ecology of both communities. Recently, I attended a Sudbury meeting and talked with Eversource representatives. I listened to their plan and viewed their visuals.

The proposed route will go through the Hop Brook reservation land, the Sudbury Valley Trustees Memorial Forest and the Assabet River National Wildlife Refuge. It will travel through multiple DEP Wetland areas, through vernal pools identified by the Natural Heritage and Endangered Species. The damage to ecology and conservation is unmeasurable.

Over 500 Sudbury homes and approximately 100 Hudson homes will be negatively affected by the proposed 8.9 mile long local cut, running through this historic area.

Lines through Sudbury's neighborhoods will clear cut 8.9 mile long 82 foot wide swath along an MBTA right-of-way and erect 75-100 ft towers carrying overhead high voltage wires through Sudbury into Hudson.

The high voltage powerlines will continue into Hudson along the Marlborough State Forest, past wetlands that drain into the Cranberry Bog Well which is Hudson's drinking source, past White Pond and run along the edge of the Charter Oak Golf Course and past Ferjulians's Farm.

Eversource plans to file with the EFSB in April. This matter is time sensitive as Ever source is moving very quickly . Your intervention is extremely needed. This plan would completely destroy the conservation areas.

There is an alternate option- to put the power lines **under the street**. This has been rejected by Eversource. Yes, it is more expensive but we in the Massachusetts Communities place a value on preserving the environment in Sudbury and Hudson- rather than the shortest cheapest route.

Governor Baker, I am respectfully requesting that you meet with Eversource and the Energy Facilities Site Board regarding the route selection of this utility project .

I ask you to consider the short-term savings of taking the shortest, cheapest route versus the long-term cost of the quality of life of the residents. I look forward to your response.

Thank you for your consideration,

Respectfully,

Governor's Councillor Marilyn M. Petitto Devaney



COMMONWEALTH OF MASSACHUSETTS
THE GENERAL COURT
STATE HOUSE, BOSTON 02133 1053

Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Chairwoman Angela M. O'Connor
Department of Public Utilities
One South Station
Boston, MA 02110

Dear Secretary Beaton and Chairwoman O'Connor:

As legislators representing the communities of Hudson, Marlborough, Stow and Sudbury, we are writing to express our strong opposition to the Eversource plan to construct a transmission line along the abandoned MBTA rail line that runs through these four communities. Instead, we recommend that the Department of Public Utilities (DPU) and the Energy Facilities Siting Board, and therefore the Baker-Polito administration, rule that Eversource build this transmission line under the roads of these four communities.

Over the past month, we have attended Board of Selectmen meetings, public hearings, met with constituents, and received hundreds of calls and emails from residents of these four communities, almost all in unison expressing serious concern over the impact of Eversource's proposed path to build a transmission line to improve reliability of the delivery of power to the region.

While we support improving the system's reliability, we believe the proposed path will not serve our constituents well, for a variety of reasons.

First of all, this proposed transmission line along the MBTA railbed would result in a clear-cutting of at least an 82 foot wide swath of trees and vegetation along the transmission route, having a negative environmental impact on these four communities, and especially on abutters to this proposed transmission route.

This land is important not just for the abutters, however. Rather, a great deal of this land is considered sacred by the residents of Hudson, Marlborough, Stow and Sudbury, and in fact people from across Massachusetts. Over the past few decades, residents have proactively voted

to protect open space along the proposed route, and state and federal agencies, and elected officials, have gone to great lengths to protect this area from development.

This has led to the establishment of the Hop Brook Conservation Land, the Sudbury Valley Trustees Memorial Forest, and the Assabet Valley National Wildlife Refuge, the Marlborough-Sudbury State Forest, and the Cranberry Well property, all publicly-protected land that include wetlands, vernal pools, and significant rivers and streams.

While Eversource has made the point that an alternative route to constructing the transmission route along the MBTA railbed would be more expensive to Eversource ratepayers, we would respectfully respond and ask, what price do you put on the clear-cutting and despoiling of precious conservation land, beautiful views, ecological diversity, and taxpayer-funded open space?

There is a clear and reasonable alternative to the proposed Eversource transmission line route, and we ask that as your review Eversource's application, that you order Eversource to construct its transmission route along the roads of these four Metrowest communities, and not along much-loved protected lands.

Sincerely,



James B. Eldridge
State Senator
Middlesex & Worcester District

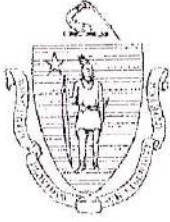


Kate Hogan
State Representative
Third Middlesex District



Carmine L. Gentile
State Representative
Thirteenth Middlesex District

cc: Mark Reed, Director of Government Affairs, Eversource
Mayor *Arthur G. Vigeant*, City of Marlborough
Brian Choquette, Manager, Hudson Light and Power Department
Thomas Moses, Executive Assistant, Town of Hudson
William Wrigley, Town Administrator, Town of Stow
Melissa Murphy-Rodrigues, Town Manager, Town of Sudbury



CARMINE L. GENTILE
STATE REPRESENTATIVE
13TH MIDDLESEX DISTRICT
SUDBURY • MARLBOROUGH
WAYLAND • FRAMINGHAM

The Commonwealth of Massachusetts
House of Representatives
State House, Boston 02133-1054

Committees:
Joint Committee on Higher Education
Committee on Technology and
Intergovernmental Affairs
Joint Committee on Elder Affairs
Committee on Global Warming
and Climate Change

STATE HOUSE, ROOM 39
TEL. (617) 722-2014
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Carmine.Gentile@MAhouse.gov

June 20, 2016

Honorable Members of the Joint Committee on
Telecommunications, Utilities and Energy
MA State House
Room 413-F
Boston, MA 02133

Dear Chairman Golden, Chairman Downing, and Honorable Members of the Committee,

I write to you today to respectfully request that you vote H4357, An Act relative to the Energy Facilities Siting Board (EFSB), favorably out of Committee.

Eversource is currently planning to file a project with the EFSB in September which would severely impact two communities in my district, Sudbury and Marlborough, together with the Town of Hudson. The plan previously aired this past spring would clear cut an area of 60 acres in Sudbury to place 100 foot high poles carrying a 115 kilovolt (kV) line. An area large enough to place three (3) Gillette Football Stadiums would cut through four protected conservation areas, Hop Brook Marsh, Memorial Forest, Assabet River National Wildlife Refuge and Marlborough-Sudbury State Forest along a path 82 feet wide.

H.4357 would cause the EFSB to consider a proposal's impact on public health and the environment, not just the financial costs and prioritize minimum impact on the overall wellbeing of residents abutting a project over the "lowest possible cost" of the proposal when considering whether or not to grant a permit.

Eversource has gone back to the drawing board to formulate a pathway for the 115 kilovolt line through Sudbury, Marlborough and Hudson. However, the plan aired earlier this year would have placed 100 foot high towers and an 82 foot clear cut adjacent to 600 properties negatively impacting property values substantially and causing approximately 26,795 trees to be removed. Another 1200 properties are within 3,000 feet of the path previously chosen.

A route underneath existing streets would not disturb sensitive conservation lands or adversely affect property values.

Cities and towns in the path of new transmission lines should not have to bear the overwhelming brunt of the burdens imposed by projects that bolster regional infrastructure without due consideration of environmental and safety concerns. The project for a new 115 Kv line through my district will benefit municipalities from Northborough through Waltham and communities in Southern New Hampshire.

I respectfully request that you report H.4357 favorably out of Committee as soon as possible and add an emergency preamble.

Sincerely,

A handwritten signature in cursive script, appearing to read "Carmine L. Gentile". The signature is written in dark ink and is positioned above the printed name.

Carmine L. Gentile



The Commonwealth of Massachusetts
MASSACHUSETTS SENATE

SENATOR JAMES B. ELDRIDGE

100 STATE STREET, SUITE 2107
BOSTON, MASSACHUSETTS 02109
TEL: 617-725-2200
FAX: 617-725-2200
WWW.JBELD.RIDGE.SEN.MA.GOV

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June 21, 2016

The Honorable Benjamin Downing, Chair
Joint Committee on Telecommunications, Utilities & Energy
State House Room 413F
74 Beacon Street
Boston, MA 02133

RE: H.1357 *An Act relative to the Energy Facilities Siting Board*

Dear Chairman Downing:

The Town of Sudbury is currently the potential site of an overhead high voltage transmission line, designed to provide service to the Town of Hudson and parts of southern New Hampshire. The project would require above ground wires running on poles through neighborhoods and conservation land, the clear cutting of trees 82 feet wide, and the spraying of herbicides in and around their conservation land. The town is understandably concerned about these effects as well as decreased property values, which will negatively impact the Town's budget.

Everource, the proponent of the project, is planning to file their application with the energy facility siting board in September 2016. The company understands the impacts to the town but is continuing the application process because this is the least expensive option for them.

This bill would add impact language to the energy facility siting board statute that would restrict board-approved projects to those "with minimal impact on the environment, public health, and the overall wellbeing of residents abutting the project." These factors are crucial to the health and safety of, not just Sudbury residents, but all residents of the Commonwealth and the board should consider them when approving new energy projects.

Should you have any questions or concerns, please do not hesitate to contact my office.

Sincerely,

Jamie Eldridge
State Senator
Middlesex & Worcester



Official Statement from Mass Audubon, March 30, 2016

Mass Audubon generally supports a rigorous alternatives analysis for any project proposing to impact conservation lands protected by Article 97 of the State Constitution, mapped habitat of state- or federally-listed rare species, and/or wetlands. We commend Protect Sudbury and local residents for calling for consideration of alternatives to the routing of this utility line through several protected and sensitive areas. We are hopeful that with your involvement, a revised plan will be developed that meets the needs for electric grid reliability without the extensive impacts initially proposed.

Christina Wiseman on behalf of Jack Clarke
Director of Public Policy & Government Relations



Advocacy Department

Six Beacon Street, Suite 1025 • Boston, Massachusetts 02108
tel 617.962.5187 • fax 617.523.4183 • email jclarke@massaudubon.org

September 12, 2016

Beverly Schultz, Project Manager
Eversource
One NSTAR Way
Westwood, MA 02090

Via Email: Beverly.Schultz@Eversource.com

Re: Eversource Transmission Line, Sudbury to Hudson

Dear Ms. Schultz,

On behalf of Mass Audubon, I am writing to request that Eversource consider alternatives for the proposed Sudbury to Hudson Transmission Reliability Project. We understand that the proposed new 8.9 mile, 115kV transmission line is deemed necessary for system reliability. However, the preferred route has significant, permanent impacts on many other important public interests that must also be considered. Several permanently protected lands would be impacted including the Assabet River National Wildlife Refuge, Marlboro State Forest, Sudbury Valley Trustees Memorial Forest, and Hop Brook Marsh Conservation Land. The effects on these federal, state, local, and nonprofit conservation lands would be significant and ongoing. Large, interconnected areas of forestlands and wetlands are vital for ecological health and integrity. Clearing an 82 foot wide swath through these lands would fragment wildlife habitat, create adverse edge effects, and increase impacts from invasive plants and illegal ATVs (both of which are costly and difficult to manage). The cleared Right-of-Way (ROW), poles, and wires also would impact the character and recreational value of the conserved lands. Vegetation management along the ROW would require frequent use of mechanized mowing or cutting equipment and/or herbicides, all of which have additional impacts on wildlife and the environment.

Mass Audubon understands that the reliability of the electric grid is an important priority for public utilities. As Eversource plans for those projects, both in this instance and in other locations, the full costs of overhead vs. underground lines should be considered in lifecycle terms. Underground lines, including lines constructed within roadways, are more expensive initially. However, they are more reliable, especially in the context of increasingly frequent extreme weather events associated with climate change. Over the many-decades-long service life of the lines, the costs associated with maintaining overhead lines and associated ROW are significant and should be taken into account.

In calculating the costs of constructing lines through and adjacent to protected lands, the full costs and availability (or lack thereof) of mitigation lands of equivalent natural resource value must also be considered. The Executive Office of Energy and Environmental Affairs' policy on disposition of lands protected under Article 97 of the state Constitution requires not merely consideration of the market value of the impacted lands but also the natural resource value. In rapidly developing suburbs such as Sudbury and Hudson, land available for replacement conservation is limited, and it is not feasible to fully mitigate for the fragmentation effects on large blocks of woodland.

We urge Eversource to factor these considerations into alternatives analysis and cost accounting for this and other grid improvement projects, before submitting project proposals to the Energy Facilities Siting Board (EFSB). We also request that the utilities and EFSB plan for and support a transition to greater reliance on distributed, renewable power sources located at or near where the power will be consumed. This can reduce the need for expensive expansion of the grid system while supporting the transition to clean and green energy.

Thank you for considering these comments.

Sincerely,



John J. Clarke
Director of Public Policy & Government Relations

cc: Energy Facilities Siting Board
Conservation Law Foundation

Mass Audubon protects 36,500 acres of land throughout Massachusetts, saving birds and other wildlife, and making nature accessible to all. As Massachusetts' largest nature conservation nonprofit, our wildlife sanctuaries located in cities and towns include 20 nature centers and welcome over half a million visitors annually. From inspiring hilltop views to breathtaking coastal landscapes, serene woods, and working farms, we believe in protecting our state's natural treasures for wildlife and for all people – a vision shared in 1896 by our founders, two extraordinary Boston women. Today, Mass Audubon is a nationally recognized environmental education leader, offering thousands of camp, school, and adult programs that get over 225,000 kids and adults outdoors every year. With more than 125,000 members and supporters, we advocate on Beacon Hill and beyond, and work with conservation science partners, to preserve the natural heritage of our beautiful state for this and future generations. We welcome you to explore a nearby sanctuary, find inspiration, and get involved. Learn how at massaudubon.org.

Protecting the Nature of Massachusetts



BOARD OF DIRECTORS

September 6, 2016

Laura Rome

President

Maynard

Beverly Schultz

Project Manager

Eversource

Ingeborg Hegemann

Vice President

Stow

One NSTAR Way

Westwood, MA 02090

Richard Tardiff

Treasurer

Natick

Re: Comments on proposed Sudbury-Hudson Transmission Line Project (corrected)

Dear Ms. Schultz,

Dick Lawrence

Clerk

Hudson

OARS would like to submit our concerns regarding the proposed Sudbury-Hudson Transmission Line which would run through and along several parcels of conservation land in Sudbury and Marlborough to Hudson. OARS has studied the coldwater fisheries resources present in these conservation areas in depth and continue to monitor their condition and we are concerned about the impact of the construction and maintenance of the proposed transmission line on these resources.

Don Burn

Westborough

Robert Donelan

Concord

Starting in 2012, OARS has assessed the ecological health of small trout streams in Sudbury, Marlborough and Hudson. These streams have some of the few remaining native Eastern brook trout (*Salvelinus fontinalis*) populations in eastern Massachusetts. Aside from being one of nature's most beautiful fish, the Eastern brook trout is a keystone species in the northeastern US. They inhabit flowing, highly oxygenated, coldwater streams and once occupied most of the coldwater streams in the eastern US. Today, geographically-isolated populations remain in only about 10% of the subwatersheds in eastern Massachusetts. The survival of these remaining populations is threatened by the pressures of human development including streamflow and temperature changes due to loss of natural vegetation, undersized road culverts, non-point source pollution, and climate change.

Lisa Eggleston

Sudbury

Allan Fierce

Stow

Paul Goldman

Marlborough

Dave Griffin

Maynard

Brian Kilcoyne

Concord

OARS, Trout Unlimited, Sudbury Valley Trustees, the USGS Conte Fish Research Lab, and UMass Amherst collaborated to assess and protect brook trout habitat in the three Sudbury River tributaries known to have wild brook trout populations: Hop Brook, Cranberry Brook and Trout Brook. This work included assessing current conditions and is part of a state-wide project to monitor climate change effects through longer-term stream and air temperature logging, which continues today.

Martin Moran

Hudson

Pam Rockwell

Concord

Peter Shanahan

Acton

The stream quality in both Trout and Cranberry Brooks was good to excellent within the protected areas of Memorial Forest, the Desert Natural Area, and adjoining protected areas. See attached map. The main factor that degraded the ratings in these protected areas was whether the stream was shaded. Hop Brook is more degraded but still used by brook trout to travel between the other brooks.

Lisa Vernegaard

Maynard

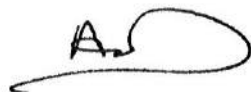
The proposed transmission line would cross Hop Brook just downstream of Trout and Cranberry Brooks. Clearing and maintaining an 82-foot wide transmission line corridor will result in loss of shading by the existing trees and bushes, resulting in warmer temperatures. During the summers our monitoring shows that the water temperatures approach the warmest allowable temperature before fish health is affected. Every effort needs to be taken to prevent further warming. Additional clearing could have a negative effect. The fish and their habitat could be exposed to herbicide should herbicide be used to maintain the open corridor. Lastly, the cleared corridor would encourage the use of ATVs and dirt bikes which are extremely damaging as they cross streams without regard to the erosion and siltation that they create; they are notoriously difficult to control.

Alternatives to this ecologically-damaging route must be considered. Putting the transmission line under already-existing streets would result in far less ecological damage. Some commenters have suggested burying the transmission lines beside the existing railroad bed. Unless great care can be taken to protect the streams during construction and suitable stream crossings designed, burying the transmission lines risks permanently damaging the natural courses and connectivity of the streams. The need to maintain a cleared corridor would still, presumably, necessitate the use of herbicides.

We appreciate the need to increase the reliability of the grid, particularly with climate disruptions that increase the likelihood of damaging wind and ice storms. However to damage one of the few remaining healthy wild trout habitats which has been protected through major public and private investment is not in the interest of either the Commonwealth or the local communities. We share the concerns detailed in letters to you by the owners of the conservation land that would be affected: US Fish and Wildlife Service, Marlborough Conservation Commission and Sudbury Valley Trustees.

Thank you for the opportunity to comment on the proposed transmission line project. We hope that you will take seriously the concerns we have raised and shift your attention to providing a viable alternative for your submission to the Massachusetts Energy Facilities Siting Board and local decision-makers. Please add us to your mailing list so that we may follow the development of this project.

Yours sincerely,



Alison Field-Juma
Executive Director

cc: US Congresswoman Niki Tsongas
US Congresswoman Katherine Clark
State Senator Jamie Eldridge
State Representative Carmine Gentile
State Representative Danielle Gregoire
State Representative Kate Hogan
Libby Herland, US Fish & Wildlife Service
Benjamin Letcher, USGS Conte Fish Research Laboratory
Matthew Beaton, Secretary EOEEA, and Chairman, Energy Facilities Siting Board
Angela M. O'Connor, Chairman, Department of Public Utilities
Leo Roy, Commissioner, Mass. Department of Conservation and Recreation

George Peterson, Commissioner, Mass. Dept. of Fish & Game
Martin Suuberg, Commissioner, Department of Environmental Protection
Mark C. Kalpin, Esq., Public Member, Environmental, EFSB
Melissa Murphy-Rodrigues, Town Manager, Town of Sudbury
Tom Moses, Executive Assistant, Town of Hudson
Arthur Vigeant, Mayor, City of Marlborough
Lisa Vernegaard, Sudbury Valley Trustees
Ray Philips, President, Protect Sudbury
Gary Crago, Greater Boston Trout Unlimited

Habitat and Culvert Evaluations - Cranberry & Trout Brooks



1:13,000 Base map data from Mass GIS (NAD 1983 MA State Plane). Hydrographic features data from USGS National Hydrography Dataset. S. Flint. OARS. Sept 2014



September 27, 2016

Jim Hunt, Vice President for Regulatory Affairs & Community Relations
Beverly Schultz, Project Manager
Eversource
One NSTAR Way
Westwood, MA 02090

Via Email: James.Hunt@Eversource.com, Beverly.Schultz@Eversource.com

Dear Mr. Hunt and Ms. Schultz,

On behalf of the Massachusetts Chapter of the Sierra Club, I am writing to urge you to retract or revise your proposal for the Sudbury-to-Hudson Transmission Reliability Project.

Any siting of a transmission line – either above or below ground – will have significant and permanent deleterious effects on protected lands, threaten the town water supply and devalue residential neighborhoods and historic districts along the path which you call the “preferred” route.

I also question whether this transmission line is really needed. I understand that at the time ISO-NE identified the reliability projects, demand was forecast to be higher than it has proven to be. Massachusetts now leads the nation in energy efficiency, and just approved the largest offshore wind procurement in the country. As costs for renewables drop and demand is managed by efficiency and demand response, old plans become obsolete and need to be revisited. Our focus should be on an energy future that preserves our environment, wildlife and human health and the historic character of our communities. It’s time to focus on localized clean electric production and consumption instead of on destructive and unnecessary legacy infrastructure.

If you continue to maintain that this is a necessary reliability project, then, given the adverse consequences of this route along the right-of-way, we ask that you withdraw your proposal in its entirety and allow (and urge) ISO-NE to re-evaluate the previously submitted proposal by National Grid that did not place transmission lines along a totally new path.

As wild lands, wildlife, recreation areas, and historic districts are increasingly at risk in our country, our obligation to current and future citizens is to do everything in our power to ensure that we preserve every precious natural resource that we currently enjoy.

We understand that Eversource is putting forth the above-ground line as a “lowest” cost proposal. We believe, to the contrary, that it and any other route through conservation lands represents the highest-cost proposal and should be discarded. We cannot afford to dismiss the consequences of failing to ignore the value to humankind of unbroken forest and wetlands, wildlife and clean water. I believe Eversource customers would like to believe they are supporting a

Massachusetts Sierra Club
October 6, 2015
Page 2

company that protects the natural environment of its customers, rather than destroying it as a purported "least cost" solution.

Renewable energy, energy efficiency, energy storage, demand response... these are the solutions of the future. New transmission lines through natural lands is not.

Sincerely yours,



Emily J. Norton
Director, Massachusetts Chapter

Cc:

Sen. Ed Markey
Sen. Elizabeth Warren
Rep. Niki Tsongas
Rep. Katherine Clarke
Sen. Mike Barrett
Sen. Jamie Eldridge
Rep. Carmine Gentile
Matthew Beaton, Secretary of Energy and Environmental Affairs
Brad Campbell, Conservation Law Foundation
George Bachrach, Environmental League of Massachusetts
Jim Gish, Protect Sudbury, Inc.



Sudbury
Historical
Society, Inc.

Sudbury Town Hall - 2nd Floor
322 Concord Road
Sudbury, Massachusetts 01776-1850
978/443-3747
director@sudbury.ma.us
sudbury01776.org

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Nancy Somers

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David Columbo
George Connor
Debra Zurka

Staff

Sally Purrington Hild
Executive Director
Lee Swanson
Curator/Archivist

March 18, 2016

Sudbury Town Manager
and Sudbury Board of Selectmen
Flynn Building
278 Old Sudbury Road
Sudbury, MA 01776

On behalf of the Sudbury Historical Society we would like to go on record as opposing Eversource's proposal to build a transmission route of high tension wires (115K volt) consisting of 70-100 foot high tension power lines directly through the heart of Sudbury. The plan of clear-cutting a path measuring 82 feet wide through 8.9 miles of one of the most historic towns in the state is an assault on Sudbury's historic character and natural environment.

This project will forever change the appearance of the town and its residential neighborhoods where essentially everything in its path will be clear cut close to abutting homes. The route will go over Hop Brook which is listed as a major stream and river by the DEP on their Integrated Rivers List. It will cut through the Hop Brook Conservation land, as well as the Sudbury Valley Trustees Memorial Forest and the Assabet Valley National Wildlife Refuge leaving a scar in its wake. It will disturb DEP wetlands and vernal pools identified by NHESP. Herbicides are proposed to keep vegetation down. These chemicals will eventually enter our streams and rivers causing further destruction to conservation lands and wildlife.

Sudbury has maintained its historic connection back to its 1639 settlement. The town celebrates its rich history with its connection to the King Phillip Wars, to the Revolution in 1775 and its citizens' march to Concord, and to its participation in the Battle of Bunker Hill. Sudbury sent one of every 10 town residents to serve in the Civil War. Sudbury deserves better.

The high tension wires will be the equivalent as having a seven-story wall all along the 8.9 miles. It will destroy the view, the environment, the historic essence, and the town will gain nothing from this intrusion on the landscape. The proposal of Eversource is completely unacceptable and we respectfully ask that you stand with the town to prevent this plan from happening.

Sincerely,

Stewart Hoover
President

Sally Purrington Hild
Executive Director



Sudbury Valley Trustees

Conservation, Collaboration, and Community since 1953

March 28, 2016

Ms. Bev Schultz
Project Manager
Eversource
One NSTAR Way
Westwood, MA 02090

Re: Sudbury to Hudson Transmission Reliability Project

Dear Ms. Schultz:

I am writing to provide comment on Eversource's proposal to construct a new 115 kV power line between Sudbury and Hudson to comply with the mandate from ISO-New England to strengthen the regional electrical grid.

Sudbury Valley Trustees is a regional land trust that owns the 220-acre Memorial Forest. This natural area 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 overhead line.

Based on these factors, Sudbury Valley Trustees strongly opposes Eversource's proposal to locate an overhead transmission line along an abandoned rail line that is owned by MBTA. If the line is approved as proposed, it will violate the integrity of Memorial Forest and the other conservation lands that abut the right-of-way. While specific plans have not been prepared, impacts would likely include the wholesale destruction or alteration of key natural features in or along the right of way. The following impacts would result from both construction and long-term maintenance activities:


1. Destruction of unusual plant populations.
2. Disturbance and alteration of breeding habitat of the recently state-listed whip-poor-will.
3. Fragmentation of one of the region's largest natural areas. The majority of the natural area is part of a priority habitat designated by the Massachusetts Natural Heritage & Endangered Species Program. The 82.5 foot wide linear clearing required by an overhead power line would alter natural dynamics as well as provide a pathway for predators and invasive plants. Research

has shown that the open/low vegetation environment that characterizes powerline corridors can be significant barriers in the movement of many bird, mammal, and amphibian species.

4. Filling and/or disruption of wetland features in and abutting the right of way.
5. Experience shows that utility lines commonly attract misuse by motorized off-road vehicles. This activity causes significant damage to the natural resources.
6. Negative impacts to visitors' experience. Memorial Forest and the Desert as a whole provide thousands of visitors from the region a rare chance to experience a natural area that is relatively free of industrial incursions. An overhead transmission line would harm this experience significantly.

Based on these adverse environmental impacts, SVT urges Eversource, along with municipal and state decision-makers, to revisit below-ground street-based alternative routes that would bypass both public and private conservation lands.

Sincerely,



Lisa Vernegaard
Executive Director

copies by email to:

Governor Charlie Baker

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

Britney McNamara, Metrowest Daily News

John Laidler, Boston Globe

Protect Sudbury



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,



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
Britney McNamara, Metrowest Daily News
John Laidler, Boston Globe
Protect Sudbury



May 11, 2016

Matthew Beaton, Chairman
Angela O'Conner, Chairman
Massachusetts Energy and Environmental Affairs
Energy Facility Siting Board
One South Station
Fifth Floor
Boston, MA 02110

Re: Eversource proposed transmission line Sudbury, MA

Dear,

Eversource has proposed a transmission line on an existing right of way (ROW) through Sudbury, owned by Mass Bay Transportation. Approximately 1.7 miles of the ROW is within the Zone II of the Sudbury Water District's gravel pack wells which are the sole source of water for over 18,000 residents of Sudbury.

The District acknowledges that 333CMR11.04, sensitive area restrictions for herbicide use, allows the use of herbicides every 24 months if they are applied selectively by low pressure, using foliar techniques or basal or cut-stump applications in Zone II areas. The District has reviewed Eversource's approved herbicide plan and although it meets the requirements of the regulations, the Sudbury Water District is still very concerned with a proposal for wide scale herbicide use in any manner in the District's Zone II. The District is very proactive when it concerns the protection of its well Zone II areas. Once contamination of the groundwater occurs, it can be extremely costly to remove the contamination, if even possible. The worst case scenario might be to abandon the contaminated well.

The Sudbury Water District is requesting that the siting board take these concerns into consideration when making a final siting decision for the Eversource proposed transmission line in Sudbury.

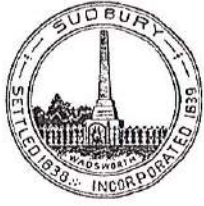
If you have any questions regarding this matter kindly contact me at (978) 443-6602 at your earlier convenience.

Sincerely,

A handwritten signature in blue ink, appearing to read 'R McEnroe'.

Rebecca McEnroe, P.E.
Superintendent

Cc: Melissa Murphy-Rodrigues, Sudbury Town Manager



TOWN OF SUDBURY

Board of Selectmen
www.sudbury.ma.us

278 Old Sudbury Road
Sudbury, MA 01776-1843
978-639-3381
Fax: 978-443-0756

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

March 17, 2016

Dear Governor Baker,

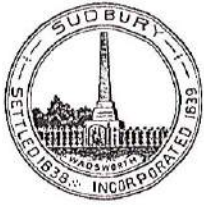
Over the past months, Eversource has introduced a reliability project in Sudbury that has drawn concerns from our elected officials, our town employees and, most importantly, our residents.

This project would run an overhead high voltage transmission line through the heart of Sudbury. The proposed transmission route will run an 115kV above ground power transmission line from Sudbury to Hudson. The proposal includes clear cutting 82 feet of trees and placing a road directly abutting 500 of our neighbors' homes. This proposal runs directly through wetlands, cuts through conservation land and will disturb the habitat of multiple species that call our community home.

This project creates an unfair burden to our community. It would decimate our environment, destroy our land and cause irreparable harm to our community. We have a duty to protect our town.

As a board, we will continue to fight for the well-being of our community. We will commit resources and funds to make certain that Sudbury remains the community we love. Sudbury is a community filled with spirit and history and a place where we respect and treasure our environment. Our community response includes concerns voiced by our Historic Districts Commission, Conservation Commission and others.

Finally, Sudbury is a place where our residents band together. As of today, over 2000 members have joined a Protect Sudbury Facebook page. Residents are motivated and



TOWN OF SUDBURY

Board of Selectmen
www.sudbury.ma.us

278 Old Sudbury Road
Sudbury, MA 01776-1843
978-639-3381
Fax: 978-443-0756

organized and ready to do what it takes to defeat this project. We join them in this fight and will work with them to protect our community.

Sincerely,

Board of Selectmen

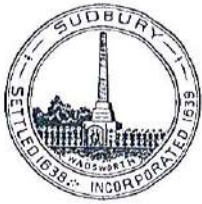
Susan Iuliano, Vice Chair

Robert Haarde

Charles Woodard

Cc:

Joanne O'Leary, Eversource
Protect Sudbury
Representative Gentile
Senator Barrett
Senator Eldridge
John Laidler, Boston Globe
Lt. Governor Karen Polito
Jay Ash, Secretary of Housing and Economic Development
Britney McNamara, Metrowest Daily News
Tom Moses, Town Administrator Hudson
Sudbury Board of Selectmen
Congresswoman Niki Tsongas
Congresswoman Katherine Clark
Senator Edward Markey
Senator Elizabeth Warren



TOWN OF SUDBURY

Board of Selectmen
www.sudbury.ma.us

278 Old Sudbury Road
Sudbury, MA 01776-1843
978-639-3381
Fax: 978-443-0756

Ms. Beverly Schultz
Eversource Project Manager
Eversource
1 NSTAR Way
Westwood, MA 02110

RE: SUDBURY TO HUDSON TRANSMISSION LINE

March 24, 2016

Dear Ms. Schultz,

On behalf of the Town, I would like to thank you and Eversource for the Open House held in Sudbury on March 16, 2016.

The Open House raised more questions than it answered. As a result, the Board of Selectmen recently met to discuss the proposed Sudbury to Hudson transmission line. The Board continues to have concerns about this project and it is acutely aware of concerns voiced by our residents.

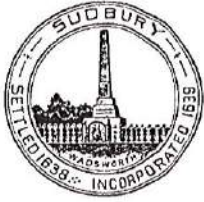
As a result of those conversations, and in an attempt to move forward in a cooperative manner, the Board of Selectmen respectfully makes the following requests.

1. That Eversource representatives meet with the Board of Selectmen to discuss geographically alternative routes and other matters.
2. That Eversource refrain from filing an application with the Energy Facility Siting Board until such conversations have taken place.

We look forward to meeting with you soon and thank you for your consideration of the Town's requests.

Sincerely,

Melissa Rodrigues, Esq. Town Manager on behalf of the
Sudbury Board of Selectmen



TOWN OF SUDBURY

Office of Selectmen
www.sudbury.ma.us

Flynn Building
278 Old Sudbury Rd
Sudbury, MA 01776-1843
978-639-3381
Fax: 978-443-0756

Matthew Beaton
Massachusetts State House
Boston, MA 02133

May 24, 2016

Dear Secretary Beaton,

The Sudbury Board of Selectmen has voted unanimously to oppose the Eversource Sudbury to Hudson Transmission Reliability Project, which would construct 4.3 miles of high voltage transmission lines through Sudbury on the MBTA right-of-way and include the use of potentially dangerous herbicides.

Our Board is deeply concerned about Eversource's plan to clear cut 82-foot wide swaths of protected forest conservation land and use potentially poisonous herbicides to prevent trees, foliage and other plants from growing back. This poses a serious threat to the environment and vital conservation land and creates health and safety risks for residents – including families that live near and abut the proposed project. About 500 homes located within range of air contamination could experience adverse economic and safety impacts.

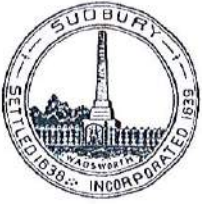
Further, about 1.7 miles of the proposed route falls within a Zone II area of the Sudbury Water District's gravel pack wells, which supply the sole source of drinking water for our 18,000 residents. The Town and the Water District are deeply concerned about potential contamination of the groundwater and possible public health risks. Remediation, if possible, would be extremely costly. The importance of protecting and safeguarding our water supply cannot be overstated, as the recent experience of Flint, Michigan illustrates.

To date, Eversource has failed to provide adequate information about the specific herbicides it plans to use for this project. Instead, the utility continues to circumvent this key issue with lists of various state agencies and manufacturers.

It's no secret that spraying herbicides can harm the environment, hurt plants and animals that inhabit these areas and create public health risks. In fact, one approved vegetation control herbicide is glyphosate, a substance that is banned in several countries and one the World Health Organization's cancer assessment agency has labeled a "probable carcinogen."

Non-toxic alternatives are available and Eversource should commit to implementing a herbicide free policy through Massachusetts. At the very least, additional study and analysis is needed to ensure that the herbicides Eversource has proposed using in the Sudbury to Hudson Transmission Reliability Project will not endanger the environment, animals or public health. In some places, the 82-foot buffer zone this project proposes would actually include private property, thus directly exposing residents to harmful and carcinogenic chemicals.

Respected environmental groups in Sudbury have also formally registered their opposition to the proposed Eversource project and the use of herbicides in any location. The Sudbury Valley Trustees and



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Conservation Commission have been working to protect vital habitats in our community for decades, and both organizations oppose the current Eversource plan due in part to the environmental risks it presents.

The entire Eversource Sudbury to Hudson Transmission Reliability Project is fundamentally flawed due to its environmental, health and safety risks, significant visual pollution, and adverse financial and safety impacts on residents and businesses. In particular, the long-term environmental and health risks from using herbicides far outweigh any short-term financial savings Eversource may generate from using these chemicals.

The Board of Selectmen takes the threat that this project poses very seriously. We request your intervention in this matter and ask that the Eversource Sudbury to Hudson Transmission Reliability Project be postponed until further study and analysis can be undertaken to fully understand the multitude of risks associated with the use of herbicides and the larger impact of this proposal on the town of Sudbury.

Sincerely,

SUDBURY BOARD OF SELECTMEN

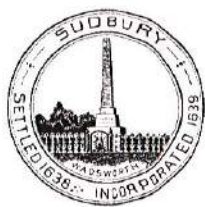
Susan N. Juliano, Chairman

Charles C. Woodard, Vice-Chairman

Robert C. Haarde

Leonard A. Simon

CC: Rebecca L. McEnroe, Sudbury Water District Superintendent



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For immediate release

Sudbury Selectmen Oppose Eversource Project

The Board of Selectmen strongly opposes the Eversource Sudbury to Hudson Transmission Reliability Project that would construct 4.3 miles of high voltage transmission lines either above or below ground through Sudbury on the MBTA right-of-way. Due to the intrusive nature of the proposal, and the environmental, economic and safety risks it presents, significant more study, information and public input is required.

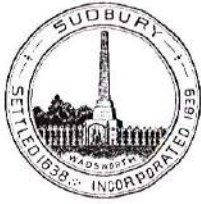
The current Eversource proposal potentially threatens the health and safety of residents, irreparably harms vital conservation land, and poses a long-term financial risk to residents, businesses and therefore this municipality. Not only will the Eversource proposal require the clear cutting of forests and the use of herbicides, it will disturb wetlands and other critical habitats for a number of animal and plant species. It will also create significant visual pollution and result in adverse financial and safety impacts for homeowners.

For all of these reasons, the Board of Selectmen has voted unanimously to oppose the Eversource Sudbury to Hudson Transmission Reliability Project.

We oppose the current proposal, overhead or underground, and will not support any alternative plan that would feature underground lines elsewhere in Sudbury without additional study, analysis and input.

We have retained counsel to represent the interests of Sudbury before the Energy Facilities Siting Board, as well as before DEP under the Massachusetts Environmental Policy Act review. The Board of Selectmen takes the threat this project poses to our community very seriously, and will act accordingly to protect the interests of Sudbury and its residents.

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For immediate release

Sudbury Board of Selectmen ‘Deeply Concerned’ About Serious Health and Environmental Risks From Dangerous Herbicides used by Eversource

*In letter to state, Board requests intervention by Secretary Beaton on
Eversource’s Sudbury to Hudson Transmission Reliability Project*

Sudbury, Mass.— The Sudbury Board of Selectmen recently raised new concerns about the Eversource Sudbury to Hudson Transmission Reliability Project and the use of potentially poisonous herbicides that threaten public health and the environment.

In a letter to Energy and Environmental Affairs Secretary Matthew Beaton, the Board said it is “deeply concerned” about Eversource’s plan to clear cut 82-foot wide swaths of protected forest conservation land in Sudbury and use herbicides to prevent trees, foliage and other plants from growing back. The herbicides pose a potentially serious threat to the town’s water supply, for residents that live near and about the proposed project, and for animals and conversation land.

The letter closed with a request for intervention by Secretary Beaton and asked that the Eversource Sudbury to Transmission Reliability Project be postponed until further study and analysis can be done to understand the multitude of risks associated with the use of herbicides.

“The entire Eversource Sudbury to Hudson Transmission Reliability Project is fundamentally flawed and the Board takes the threat that this project poses to our community very seriously,” said Susan Iuliano, Chair of the Board of Selectmen. “We are requesting intervention by the state department of Energy and Environmental Affairs so that the Eversource project can be postponed. We strongly believe that further study is needed to determine the impact of herbicide use on the health and safety of residents, our town water supply, and the overall environment.”

If approved, the Eversource project would construct 4.3 miles of high voltage transmission lines through Sudbury on an MBTA right-of-way. It would require the destruction of wetlands and other critical habitats for a number of animal and plant species. Hundreds of homes located within range of herbicide air contamination could



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experience adverse health, safety and economic impacts. Just as concerning, about 1.7 miles of the proposed route falls within a Zone II area of the Sudbury Water District's gravel pack wells, which supply the sole source of drinking water for the town's 18,000 residents.

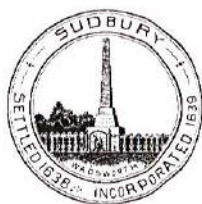
In the letter, the Board also criticized Eversource for failing to provide adequate information about the specific herbicides it would use for the project. The Board added that non-toxic alternatives are available, and that Eversource should commit to implementing a herbicide-free policy throughout Massachusetts.

"The long-term environmental and health risks from using herbicides far outweigh any short-term financial savings Eversource may generate from using these chemicals," the Board wrote in the letter.

Respected environmental groups in Sudbury – including the Sudbury Valley Trustees and the Conservation Commission – also oppose the Eversource project in part due to the environmental risks it presents.

In April, the Sudbury Board of Selectmen, citing a number of health, safety, environmental and economic concerns, voted unanimously to oppose the Eversource Sudbury to Transmission Reliability Project. It has also retained counsel to represent the interests of Sudbury before the Energy Facilities Siting Board and DEP as part of the Massachusetts Environmental Policy Act review. Eversource is expected to submit its application to the state's Energy Facilities Siting Board in September.

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For immediate release

Proposed Eversource Project Would be an “Exorbitant” Financial Burden for Town of Sudbury

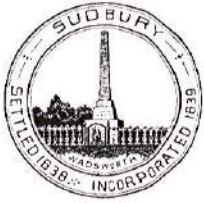
Eversource’s proposed Sudbury to Hudson Transmission Reliability Project will take an economic toll on residents, businesses and town budget.

Sudbury, Mass. (August 2, 2016) – The proposed Eversource Sudbury to Hudson Transmission Reliability Project will take a financial toll on Sudbury, creating new economic burdens for residents, businesses and the Town budget.

The Board of Selectmen expressed their concerns about the “truly exorbitant” costs of the proposed Eversource project in a letter written to state Rep. Thomas Golden and Sen. Benjamin Downing last month. In that letter, Town Manager Melissa Murphy Rodrigues outlined a variety of costs associated with Eversource’s plan to clear-cut a wide swath of protected forest conservation land to make way for 4.3 miles of above-ground high voltage transmission wires – such as potential water contamination, environmental degradation and lower property values, all of which would negatively impact the Town budget.

“The proposed Eversource project provides no direct benefit to the Town of Sudbury,” said Board of Selectmen Chair Susan Iuliano. “Despite this, our residents and businesses are being asked to shoulder an enormous financial burden. Not only does this fundamentally flawed Eversource project negatively impact the quality of life in our community, it presents a number of very serious financial, environmental and public health risks.

The Eversource project, which involves the potential use of herbicides and the clear-cutting of forests, would harm some of the Town’s most valuable conversation land and green space. As a result, the Town could face costs associated with remediation and other efforts to mitigate – as much as possible – the environmental damage created by the project. Additional costs could also result from impacts to the Town water supply. About 1.7 miles of the proposed route falls within a Zone II area of the Sudbury Water District’s gravel pack wells, which supply the sole source of drinking water for the town’s 18,000 residents. If contamination occurs, it would be difficult and expensive to remediate.



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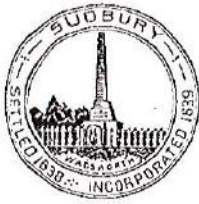
Fax: 978-443-0756

Another key economic concern is the effect the proposed Eversource project will have on home values and the overall Town budget. Abutters and other homeowners located within close proximity to the project could face a decline in home values. Selling a home in these areas could also become more difficult. As a result, fewer taxes may be collected, resulting in less revenue and less funding for necessary programs, services and infrastructure.

Earlier this spring, the Board of Selectman voted unanimously to oppose the Eversource Sudbury to Hudson Transmission Reliability Project, and the Board continues to actively voice its concerns about it. Eversource is moving forward with plans – which, if approved – would run 4.3 miles of high voltage above-ground power lines through Sudbury neighborhoods, in conservation land, and along a National Wildlife Refuge, while spraying dangerous herbicides within proximity to hundreds of homes. It would also require a massive clear-cutting of local forest, destroying critical habitats for a number of plant and animal species, and creating a number of public health and safety hazards.

The Board of Selectmen will bring these concerns before the state Siting Board as it considers Eversource's Sudbury to Hudson transmission line project. There are paths to achieve transmission reliability without inflicting lasting local harm.

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Town of Sudbury

CONSERVATION COMMISSION

275 Old Lancaster Rd.
Sudbury, MA 01776
978-440-5472
Email: ConCom@sudbury.ma.us

Wetlands • Conservation Land Management • Land Protection • Stormwater

March 15, 2016

Bev Schultz
Eversource Project Manager
Eversource
One NSTAR Way
Westwood, MA 02090

Re: Sudbury to Hudson Transmission Line Project

Dear Ms. Schultz,

The Sudbury Conservation Commission has reviewed the Eversource material presented to the Selectmen on Feb. 2, 2016. The Commission will be involved in the project in two diverse ways. One, as the regulatory authority under the Wetlands Protection Act and the wetland bylaw. No specific comments can be provided at this time in this capacity as no plan has been presented. There is no information available to determine if the project meets performance standards of these laws and regulations. We do note that much of the area within and abutting the MBTA rail line property is within sensitive wetland areas. The regulatory authority is somewhat limited as the project appears to qualify as a Limited Project under 10.53 and therefore may not need to meet the strict adherence to the WPA. The project appears to need local wetland bylaw permitting and the performance standards under the bylaw will be more restrictive. The proposed facility must cross over or go under Hop Brook and its extensive associated wetland, floodplain, and NHESP priority habitat area as well as other sensitive areas along the proposed route.

The state and local wetland regulations will be applied, as they are to all projects, to the extent necessary to ensure the performance standards are met and there is no net loss of wetland and regulated adjacent upland natural resource values and functions.

The second form of involvement of the Conservation Commission is as a direct abutter to the proposed transmission line with approximately 3,825 linear feet of abutting property line with the Hop Brook Marsh Conservation Land. This 93-acre parcel of wetland, floodplain, meadow and forest was purchased by the Town of Sudbury from the Sudbury Rod and Gun Club in 1967. It was the first parcel of conservation land purchased by the Town for the use and passive enjoyment of the trails by the public. It is the most actively used of the town's conservation lands and abuts more residential properties in town than any other conservation land.

The Eversource 2/2/16 presentation states that there were route selection guidelines. What were they? Viable alternatives appeared to be dismissed without clear reasoning as to why. What was the criteria used by Eversource in rejecting alternative routes? Cost estimates are incomplete and not available for the alternative routes considered. What were considered the "obvious flaws" that caused a route to be eliminated?

Did these flaws include:

-Disruption and alteration of the natural resources in the area will occur due to construction. Whether or not the transmission is above or below ground, the clear cutting will fragment areas of essential wildlife and biological essential uses. Along the proposed 4.3 miles in Sudbury the property contains or directly abuts 5,930 linear feet within state priority and estimated habitat areas; 6,145 linear ft. abutting protected town open space with public access; and at least eight perennial stream crossings; and ten vernal pools (5 certified and 5 with certified data collected).

-Disruption and enjoyment of the use of the Hop Brook conservation land by the public during and after the proposed Eversource Transmission line construction should be considered as part of the alternatives Eversource considered. Issues such as access, staging areas, emergency access and turn-around areas, etc. are likely to fall outside the 82.5' of the MBTA-owned parcel. The MBTA land is 82.5' in width. The proposed transmission line poles are expected to be up to 105' in height. Assuming these poles are approximately centered within the MBTA property, best case scenario has the required vegetation management area occurring 22.5' outside the MBTA land. Eversource has not addressed how they plan to deal with this; eminent domain takings? If so, has that been figured into the total project cost?

-Disruption and alteration caused by construction impacts particularly on trestle and areas with wetland directly adjacent to raised rail bed where abutting rail bed is wetland.

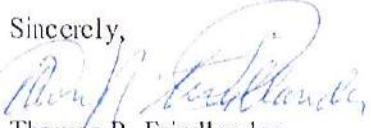
-Disruption and alteration of the natural resources in the area that will occur due to maintenance. These will include tree removal outside the 82.5' MBTA-owned land and might result in eminent domain takings of conservation land. This will trigger Article 97 of the MA Constitution. Has the taking of Article 97 land replacement been figured into the project costs?

-Disruption and alteration for further maintenance by chemical herbicides as is Eversource's practice throughout the state. Eversource uses foliar spraying of herbicides for vegetation control. How might this use effect public land and the environment? The chemical used for herbicide treatment has been glyphosate products, notably Rodeo or Round Up. In 2014, the World Health Organization declared these products "probably human carcinogens". How will the vegetation be treated to eliminate it on the gravel access road and keep the height down within the pole wire zone, border zone, and on private property?

The Sudbury Conservation Commission therefore requests that all information, including evaluation criteria, regarding the Preferred and Alternative routes be made public and that other

options are given additional, comprehensive attention. For example, underground along the Hudson Road route will have far less environmental impact. We believe that the preferred alternative within the MBTA rail line property is a *significantly* flawed alternative regardless of whether or not the transmission line is above or below ground. We believe other alternatives exist that will have much less impact on the abutting properties, the natural resources that Sudbury has worked very hard to permanently protect, and the environmental values and functions of the area, particularly the adjacent conservation lands.

Sincerely,



Thomas R. Friedlander
Chairman, Sudbury Conservation Commission

Cc:

Governor Charlie Baker
Lt. Governor Karen Polito
Sudbury Town Manager
Sudbury Board of Selectmen
Joanne O'Leary, Eversource
Protect Sudbury
Representative Carmine Gentile
Senator Barrett
Senator Eldridge
John Laidler, Boston Globe
Jay Ash, Secretary of Housing and Economic Development
Britney McNamara, MetroWest Daily News
Tom Moses, Town Administrator, Hudson
Congresswoman, Nikki Tsongas
Congresswoman Katherine Clark
Senator Ed Markey
Senator Elizabeth Warren



Town of Sudbury

Historic Districts Commission

Flynn Building
278 Old Sudbury Rd
Sudbury, MA 01776
978-639-3389
Fax: 978-443-0756

<http://www.sudbury.ma.us>

March 14, 2015

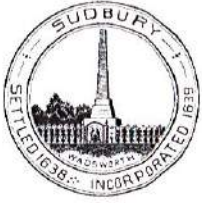
Ms. Patricia Brown, Chair of Selectmen, Sudbury, MA 01776
RE: Eversource Transmission Line Project

Dear Board members,

The following was resolved by the Sudbury Historic Districts Commission on March 3, 2016.

The Historic Districts Commission is strongly opposed to the Eversource Transmission Line Project, Preferred Route (overhead transmission line in an 82 foot wide clear cut way). The proposed route would irreparably damage or destroy protected and unprotected historic Sudbury. The proposed route cuts through the George Pitts Tavern Historic District without any regard for the historic nature of the siting and it will cut through the edge of Wayside Inn Historic District #1 and #2 again without regard to the historic nature of the siting. In addition, the 82 foot wide route would obliterate the archaeological remains of several important unprotected historic sites such as the Wayside Inn Railroad Waiting Room (circa 1897) and the Walker Garrison House (circa 1680).

Sudbury Historic Districts Commission
Voted unanimously by all present members, March 3, 2016



Melissa Murphy-Rodrigues, Esq.
Town Manager

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Office of the Town Manager
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Massachusetts State House
Office of the Governor
Room 280
Boston, MA 02133

March 14, 2016

Dear Governor Baker,

Since beginning my tenure in Sudbury as Town Manager four months ago, I have learned of an Eversource reliability project that plans to run through Sudbury to Hudson.

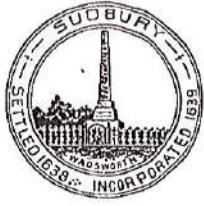
Learning more about the project and hearing from residents about this project daily, I have become more and more concerned about the negative impact on our community.

This transmission route will run a 115kV above ground power transmission line from Sudbury to Hudson. Part of this process will include clear cutting 82 feet of trees and placing a road directly abutting approximately 500 properties. In some areas, a 82 foot clear cut will lead directly to the backdoors of the homes of residents who moved to Sudbury to enjoy the view, the environment and their privacy. This transmission route will go directly through the Hop Brook Conservation Land, the Sudbury Valley Trustees Memorial Forest, and the Assabet Valley National Wildlife Refuge.

The transmission route will be destructive to our conservation lands. It will travel through multiple DEP Wetlands areas, through vernal pools identified by the Natural Heritage & Endangered Species (NHESP) list and over Hop Brook, which is listed as a Major Stream and a River by the DEP on their 2002 and 2012 Integrated Rivers List.

This proposal is unacceptable. The Town of Sudbury will be solely burdened by this project with no benefit to the residents of Sudbury. No other proposal that would be less burdensome has been introduced. Even a discussion of an underground line has been dismissed based merely on cost.

Thousands of residents have come together to oppose this project. While the situation is dire, I continue to be impressed by the residents' tenacity and organization. I'm proud to stand with them.



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Melissa Murphy-Rodrigues, Esq.
Town Manager

The community impact caused by this project is significant. The impact on our environment is unacceptable. The burden on Sudbury is unacceptable, the plan is unacceptable and I urge Eversource, our legislators and the State to stand with Sudbury to demand better for our town.

Thank you for your consideration.

Best,

Melissa Rodrigues, Esq.
Town Manager

Cc:

Joanne O'Leary, Eversource

Protect Sudbury

Representative Gentile

Senator Barrett

Senator Eldridge

John Laidler, Boston Globe

Lt. Governor Karen Polito

Jay Ash, Secretary of Housing and Economic Development

Britney McNamara, Metrowest Daily News

Tom Moses, Town Administrator Hudson

Sudbury Board of Selectmen

Congresswoman Niki Tsongas

Congresswoman Katherine Clark

Senator Edward Markey

Senator Elizabeth Warren



United States Department of the Interior



FISH AND WILDLIFE SERVICE

Eastern Massachusetts National Wildlife Refuge Complex
73 Weir Hill Road
Sudbury, MA 01776-1420

January 11, 2017

Ms. Beverly Schultz, Project Manager
Eversource
One NSTAR Way
Westwood, MA 02090

Dear Ms. Schultz:

I am writing to request an update on the status of the proposed Sudbury to Hudson Transmission Reliability Project, which runs adjacent to the Assabet River National Wildlife Refuge (NWR) in Sudbury and Hudson, MA.

As you know, we have expressed concerns with the proposed project to Eversource both in a letter dated June 28, 2016, and during a meeting at Assabet River NWR held on July 22, 2016, at which time we shared our concerns and visited the proposed site.

On December 8, 2016, I sent emails to Eversource Senior Environmental Engineer Denise Bartone requesting an update on this project. I appreciate the quick response that Eversource had not submitted its Petition to the Energy Facility Siting Board so no environmental permitting for the project had been undertaken yet.

We remain concerned about the proposed project and the impacts that the electric transmission line might have on the Assabet River NWR, and surrounding conservation lands. Our concerns include habitat fragmentation of thousands of acres of conservation land, increased invasive species, impacts from the use of herbicides, and the likely increase of unauthorized uses particularly ATV's and dirt bikes.

We sincerely hope that Eversource more fully develops an alternative proposal that would route electrical transmission cables underground through local streets, thus avoiding these and other environmental impacts including potential impacts to endangered species.

I am requesting the following information from Eversource: a description of any revised alternatives, a timeline for the proposed project, and how concerns expressed by the Assabet River NWR have been considered and addressed. Thank you.

Sincerely,

Elizabeth A. Herland
Wildlife Refuge Manager



United States Department of the Interior



FISH AND WILDLIFE SERVICE

Eastern Massachusetts National Wildlife Refuge Complex
73 Weir Hill Road
Sudbury, MA 01776-1420

June 28, 2016

Ms. Beverly Schultz
Project Manager
Eversource
One NSTAR Way
Westwood, MA 02090

Dear Ms. Schultz:

The preferred route of Eversource's proposed Sudbury to Hudson Transmission Reliability Project runs adjacent to the southern boundary of the 2,333-acre Assabet River National Wildlife Refuge (NWR) in Sudbury and Hudson, MA. The Assabet River NWR is part of the National Wildlife Refuge System, and is administered by the U.S. Fish and Wildlife Service (FWS) out of the Eastern Massachusetts NWR Complex in Sudbury. The refuge is just to the north of the 900-acre Desert Natural Area, which is comprised of multiple conservation ownerships including the Sudbury Valley Trustees and the towns of Sudbury and Marlborough. These comments reflect the concerns of the FWS that the project as currently proposed would have not only on the Assabet River NWR, but also on adjacent conservation lands.

The FWS opposes the installation of an above ground, overhead 115-kilovolt transmission line within the existing Massachusetts Bay Transportation Authority (MBTA) railroad bed. We believe an underground installation would be less disruptive to wildlife habitat and to refuge visitors. We understand that there is a mandate and need to strengthen the regional electrical grid, but it cannot occur at the expense of the few remaining undeveloped open spaces with premier wildlife habitat in this part of Massachusetts. We recommend that Eversource more fully develop an alternative proposal that would route electrical transmission cables underground through local streets, as this configuration would eliminate disruption to natural resources. An alternative underground route along the abandoned MBTA railroad bed is also a possibility, but would still have adverse environmental impacts, and is therefore not our preferred option.

Our concerns mirror those of other organizations and municipalities you have heard from already. One of these concerns is the impact of an 82-foot wide transmission corridor on the Assabet River NWR and our neighboring conservation lands. Even though a corridor currently exists, the railroad tracks are overgrown with vegetation and the corridor is

narrow. An 82-foot wide corridor (or even a narrower corridor if the underground option along the railroad bed) would fragment wildlife habitat. Habitat fragmentation can make lands unsuitable for certain wildlife species by effectively reducing parcel size, which impacts species with large territorial needs. It increases edge habitat which can contribute to increased use by undesirable species such as brown-headed cowbirds, which have been documented to thrive in fragmented habitat and reduce native bird biodiversity. This is an important consideration since so many of the species which exist in this area are State-listed or special concern species, and the majority of the area is priority habitat designated by the Massachusetts Natural Heritage and Endangered Species Program.

The use of herbicides to manage vegetation within this right of way could impact vernal pools, wetlands and any wildlife species utilizing the vegetated areas under and around the powerlines. Even mowing the vegetation under and around the powerline would negatively impact wildlife nesting or feeding in the grasses and shrubby vegetation.

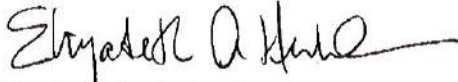
A wider corridor could become an attractive nuisance in that it would appeal to unauthorized all terrain vehicle (ATV) riders and motorized dirt bike riders. There are many places throughout the Commonwealth where this unauthorized use occurs under transmission lines. State and local municipalities do not have the resources to control illegal ATV use. We already have a problem with unauthorized ATV use on the Assabet River NWR and our partner conservation lands, and we dedicate considerable federal law enforcement resources to apprehend these illegal riders. Through effective enforcement, we have managed to minimize damage to wildlife and its habitat on the Assabet River NWR. Enforcement on municipal and private conservation lands is much harder, and none of us have the resources to sufficiently manage any increased illegal and undesirable use by motorized dirt bikes and ATVs.

Additionally, the presence of large overhead towers and transmission lines will adversely impact the outdoor experience of visitors to these conservation lands. The transmission line is an industrial use located within natural open space. It will be an eyesore at best and will reduce our ability to meet the mandated requirements of the National Wildlife Refuge System Improvement Act to provide quality wildlife observation and photography opportunities to the American public.

Lastly, we are concerned about the impact this transmission line will have on our ability to conduct prescribed burns on the Assabet River NWR and adjacent conservation lands. We are working together cooperatively with partners to manage this area as a pine-oak habitat, a habitat in the Commonwealth that supports many rare species and requires periodic burning to maintain its viability and biodiversity. We are working towards management where prescribed burning will be able to take place on multiple ownerships. A large overhead transmission line that bisects the conservation lands will impact the ability to burn effectively and efficiently, and could eliminate some areas from using fire altogether as a habitat management tool.

It is our hope and expectation that you will carefully consider these comments as you move from the conceptual stage to preparing the documents for submission to the Massachusetts Energy Facilities Siting Board. Please add my name to your mailing list so that we may be kept informed of future actions regarding this proposal.

Sincerely,



Elizabeth A. Herland
Wildlife Refuge Manager

cc:

U.S. Senator Elizabeth Warren
U.S. Senator Edward Markey
U.S. Congresswoman Niki Tsongas
U.S. Congresswoman Katherine Clark
Governor Charlie Baker
Matthew Beaton, Secretary MA EOEEA
George Peterson, Commissioner, Department of Fish & Game
Leo Roy, Commissioner, MA Department of Conservation and Recreation
Mark Boyle, MBTA
State Senator Jamie Eldridge
State Senator Michael Barrett
State Representative Carmine Gentile
State Representative Danielle Gregoire
State Representative Kate Hogan
Melissa Murphy Rodrigues, Sudbury Town Manager
Tom Moses, Executive Assistant, Town of Hudson
Arthur Vigeant, Mayor, City of Marlborough
Dave Manjarrez, President, Friends of Assabet River NWR
Lisa Vernegaard, Executive Director, Sudbury Valley Trustees
Elfriede Parker, Acting President, General Federation of Women's Clubs of
Massachusetts
Leslie G. Hamilton, Protect Sudbury
Jennifer Krowchun, O'Neill and Associates
Beverly O'Leary, Eversource
Mark Kimball, Eversource



KATHERINE M. CLARK
CONGRESS OF THE UNITED STATES
5TH DISTRICT OF MASSACHUSETTS

October 18, 2016

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

Re: Sudbury to Hudson Transmission Reliability Project

Governor Baker,

We are writing to share the serious concerns raised by our constituents regarding the proposed Sudbury to Hudson Transmission Reliability Project. As a mandated project, we are supportive of strengthening the regional electric grid and do not dismiss the demand for more reliable service, but not at the expense of creating potentially lasting damage to the environment, significant economic burdens, and potential health concerns.

We have heard from residents of Sudbury and Hudson, their respective Boards of Selectmen, the U.S. Fish and Wildlife Service, the Friends of the Assabet River National Wildlife Refuge, and area conservation and historical commissions. All are voicing serious concerns about the project and the preferred Eversource route, which would run 4.3 miles of high voltage above-ground power lines alongside neighborhoods, conservation land, and along a National Wildlife Refuge, while spraying herbicides within close proximity of hundreds of homes.

Our understanding is that the preferred Eversource route would require installation of overhead transmission lines and an 82-foot wide clear-cut of the vegetation and growth currently present in the area. The above environmental organizations have conveyed that this would be disruptive to the habitat and that it could potentially create conditions "unsuitable for certain wildlife species, many of which are State-listed or special concern species." They have also expressed concern that the above ground transmission lines could interrupt periodic burning that serves as an important and necessary habitat management tool and adversely impact the outdoor experience for visitors.

The Hudson and Sudbury Selectboards have raised concerns we would like to reiterate regarding the subsequent impact the project could have on the towns' equalized value and levy ceiling, combined with the potential costs associated with remediation to mitigate environmental damage from the project, could negatively impact town budgets, resulting in decreased funding for needed programs, services and infrastructure. Additionally, potential health concerns for residents, specific to the contamination of the drinking water supply resulting from the required spraying of chemicals, have also been raised.

It is our sincere hope that your office will give all due consideration to the issues raised in this letter and will continue to work to address the concerns of all communities impacted by the Eversource Sudbury to Hudson Transmission Reliability Project.

Sincerely,


Elizabeth Warren
United States Senator


Niki Tsongas
Member of Congress


Katherine M. Clark
Member of Congress

October 21, 2016

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

Governor Baker,

I write to bring to your attention concerns that have been raised regarding Eversource's proposed Sudbury to Hudson Transmission Reliability Project. Continuing to strengthen our regional electric grid is important but should be done in a way that does not harm the environment and conservation land and is respectful of local communities.

The communities of Sudbury and Hudson that would be impacted by this project, the U.S. Fish and Wildlife Service, and other stakeholders have all expressed concern about the project as it is currently proposed. The preferred route for this project would create an 82-foot wide transmission corridor for high voltage, above-ground power lines through these communities and which could impact a National Wildlife Refuge.

The Fish and Wildlife Service has written that it opposes the installation of an above ground transmission line and associated corridor because of the impacts on the Assabet River National Wildlife Refuge (NWR) and neighboring conservation lands. The Service wrote that the creation of such a transmission corridor would fragment wildlife habitat, which can potentially create conditions "unsuitable for certain wildlife species." The Service continued, "this is an important consideration since so many of the species which exist in this area are State-listed or special concern species." They also expressed concern that the above ground transmission lines could interrupt prescribed periodic burning that serves as an important and necessary habitat management tool and adversely impact the outdoor experience for visitors to these conservation lands. Finally, the Service has stated that the use of herbicides within the right of way "could impact vernal pools, wetlands and any wildlife species utilizing the vegetated areas under and around the powerlines."

The communities of Hudson and Sudbury that would be affected by this proposed transmission project have also raised concerns. Local residents and community representatives have voiced concerns about the potential impacts on the environment and the potential financial costs that may be imposed upon these communities associated with this proposed project.

I hope that you will closely evaluate these issues and continue to work to address the concerns that have been raised by impacted communities and conservation land management agencies regarding this proposed project.

Thank you for your consideration of this request.

Sincerely,

Edward J. Markey
United States Senator