



## City of Marlborough Conservation Commission

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July 5, 2017

Matthew Beaton, Secretary  
Executive Office of Energy and Environmental Affairs  
Attn: MEPA Office - Page Czepiga e-mail: [page.czepiga@state.ma.us](mailto:page.czepiga@state.ma.us)  
100 Cambridge St., Suite 900  
Boston, MA 02114

Re: EEA# 15703, Sudbury-Hudson Transmission Reliability Project

Dear Secretary Beaton;

On behalf of the Marlborough Conservation Commission, we offer the following comments on the Sudbury Hudson Transmission Reliability Project presented by Eversource Energy EEA# 15703. A very small portion of the project passes through property within the City of Marlborough known as the Desert Natural Area managed by the Marlborough Conservation Commission. Given that this project is being scoped for an EIR we offer the following comments.

1. Alternative route - Given the sensitive nature of the unique pitch pine scrub oak habitat and the ecological value of the property that the railroad tracks run through at the Desert Natural Area, Memorial Forest, Hop Brook Reservation and Assabet River Wildlife Refuge it seems that the route along the existing roadway would have the least environmental impact overall. We would encourage an environmental analysis between the existing road route and the railroad line alternative to better understand the short and long term ecological impacts to this habitat which we have invested much time and lots of funding from many sources to restore.
2. Habitat restoration efforts - Over the past 20 years the city has invested time and money and received numerous grants to help restore the unique pitch pine scrub oak habitat of the Desert Natural Area. Together with the Sudbury Valley Trustees in 2014 we conducted a prescribed burn as encouraged and funded by NHESP, NRCS and private foundation funding. We have also prepared a forest stewardship plan with funds from DCR; and an invasive plant removal project summer 2017 with funds from the MassWildlife Habitat Management Grant Program. As noted in the ENF this area is in a Priority Habitat for species of special concern. Therefore, we encourage you to require a more detailed analysis of the short-term construction impacts and the long-term

maintenance impacts such a project would have on this unique habitat area in Marlborough, Sudbury and Hudson. In addition, the streams that run through the Desert Natural Area are one of the few cold water native brook trout streams in the area due to the unique soils and wooded areas that can produce clean cold oxygenated water. An analysis of construction and long-term maintenance impacts on the brook trout habitat should also be required. See comments from OARS who has done a much more detailed study of this area's unique qualities. We are so proud to boast that we have this native brook trout habitat so close to Boston and have been working very hard to ensure it remains. With global warming impacts on the horizon everything we can do to keep the streams cool and tree covered is our only hope in keeping this native brook trout habitat viable. When considering environmental impacts and costs of the project as described in the ENF it states that "through a detailed evaluation of the potential environmental impacts and cost of each route, the Company determined that the proposed underground route will minimize environmental impacts while keeping the cost of the project as low as possible." (Pg. 6) We ask that the cumulative environmental costs of our restoration efforts and long-term land management goals also be considered in the EIR analysis of the project alternatives.

3. Ongoing maintenance - More discussion and explanation is required to determine what the long-term maintenance and disturbance would be for a utility corridor of this type. Tree clearing and changes to the area during construction must be properly mitigated. A discussion and analysis of what type of long term maintenance along this corridor is required. This should include information about: the tree clearing width; what type of Pesticide/herbicide use is required and at what intervals; can the tree canopy grow back to create a canopy over the trail, or must it be kept clear and open?? Given the sensitive nature of the stream to heat and pollution, and the unique habitat along this corridor what will the impact of such a corridor be to the adjacent habitat types
4. Corridor width- transmission line and access Rd. During the site visit on June 12, 2017 there was discussion of narrowing the corridor width which was feasible over the bridges. It was unclear why the corridor for the utility which is described as 22 feet wide (with maintenance of a 30-foot-wide corridor) could not be reduced to 14 feet and have the duct bank under the access road. A narrower corridor width would reduce heat, allow for better tree covered corridor over time and have overall less disturbance. This should be analyzed as well if the railroad corridor is to be used at all. Limiting corridor width and tree clearing is essential to reducing environmental impacts. Most bike paths allow for trees to grow overhead and recreate a canopy over the trail. The narrower the corridor the more likely it will be to have tree cover throughout. We understand through the ENF and site visit discussions that the tree canopy would need to be cleared

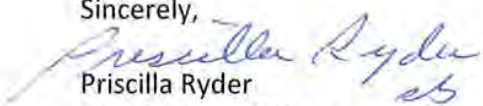
during construction to allow for cranes and equipment. However, what is the long-term tree canopy impact?

5. Contaminated soil removal plan - When the Assabet River Rail trail was constructed in Marlborough arsenic and lead were found in some sections of the ROW corridor where pesticides had been used for maintenance. A discussion in the EIR as to how these areas will be tested, and contaminated soils removed should be included.

We have invested lots of time and money through state, federal and private funded projects to restore the pitch pine scrub oak habitat in the Desert Natural Area which abuts this proposed utility project. We are seeing the return of breeding birds to the area because of this effort. We hope the EIR will adequately study and explore the short and long term impacts a utility corridor of this type would have and discuss clearly any mitigation, alternatives etc. to avoid and minimize degradation to this unique habitat.

We appreciate the opportunity to comment. Should you have any questions, I can be reached at 508-460-3768 or [pryder@marlborough-ma.gov](mailto:pryder@marlborough-ma.gov)

Sincerely,

  
Priscilla Ryder  
Conservation Officer

e-mail:

Marlborough Con. Com.  
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State Senator Jamie Eldridge  
State Representative Danielle Gregoire  
Libby Herland, US Fish & Wildlife Service  
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Debbie Dineen, Sudbury Conservation Commission  
Pam Helinek, Hudson Conservation Commission  
Carmine Gentile – State Representative