



BOARD OF DIRECTORS

June 29, 2017

Laura Rome
President
Maynard

Executive Office of Energy and Environmental Affairs
Attn. MEPA Office
Page Czepiga, EEA No. 15703
100 Cambridge St., Suite 900
Boston MA 02114

Ingeborg Hegemann
Vice President
Stow

Richard Tardiff
Treasurer
Natick

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

Dick Lawrence
Clerk
Hudson

Dear Ms. Czepiga,

Don Burn
Westborough

OARS would like to submit our comments on the above project as described in the Environmental Notification Form (rev. 6/12/17) and site visit and public meeting held June 12, 2017 both of which we attended. OARS is the watershed organization for the Assabet, Sudbury and Concord River watersheds which make up the Concord Basin. Our mission is to protect and preserve the water resources of the 400-square mile area.

Robert Donelan
Concord

Lisa Eggleston
Sudbury

Allan Fierce
Stow

OARS has studied in depth the coldwater fisheries resources present in the conservation areas in Sudbury, Marlborough and Hudson through which the project runs and continues to monitor their condition. We are concerned about the impact of the construction and maintenance of the proposed transmission line on these resources. There has been considerable public investment in this research, including by Mass. Environmental Trust, USGS Conte Fish Research Lab, UMass Amherst, and by volunteers at Sudbury Valley Trustees, Trout Unlimited, and OARS. There has also been major public and private investment in land acquisition to protect the wildlife and water supply resources that the project area contains.

Paul Goldman
Marlborough

Dave Griffin
Maynard

Brian Kilcoyne
Concord

We are particularly concerned that review and permitting of this project by the Energy Facilities Siting Board not proceed without the MEPA review being completed and a Secretary's Certificate issued on a completed and accepted Environmental Impact Report. The EIR provides essential information that must be considered in the decision-making on this project by the EFSB and other state parties.

Martin Moran
Hudson

Pam Rockwell
Concord

Starting in 2012, OARS 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.

Peter Shanahan
Acton

Lisa Vernegaard
Maynard

This goal of this research collaboration was 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. Trout and Cranberry Brooks are both state-designated Coldwater Fishery Resources (CFRs). Our research determined that 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 maps and Figure 5-24 of Eversource's EFSB filing. 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.

The proposed transmission line would cross Hop Brook just downstream of Trout and Cranberry Brooks. Clearing and maintaining a 30-foot wide transmission line corridor will result in loss of shading by the existing trees and bushes, resulting in warmer temperatures. During the summer our monitoring shows that the water approaches the warmest allowable temperature before fish health is affected. Every effort needs to be taken to prevent further warming and clearing the tree overstory could have a negative effect. We're particularly concerned that fish and their habitat could be exposed to herbicide if herbicide is used to maintain the open corridor.

The following comments relate directly to the scoping of the Environmental Impact Report. There must be an Alternatives Analysis that includes an alternate route and a no-build alternative. The rest of the comments generally pertain to the route described in the ENF.

1. Alternatives. Alternatives to this very environmentally-sensitive route must be considered. Putting the transmission line under already-existing streets would result in far less ecological damage, both in the short and long terms. We ask that a thorough and detailed analysis of the under-street route be provided in the DEIR. In particular the long-term impacts should be described, including the impacts of vegetation maintenance. The DEIR should also include a No-build Alternative with the same level of environmental impact analysis as the other alternatives to provide a comparative baseline.

2. Stream crossings. Unless great care can be taken to protect the streams during construction and suitable stream crossings designed, burying the transmission lines along the rail route risks permanently damaging the natural courses and connectivity of the streams. The proponent should provide detailed designs for all stream and wetland crossings. and where the duct bank will be located under the service road/rail trail to minimize environmental impact (Eversource EFSB filing Figure 5-16, Sheet 1). These crossings should meet the state's Stream Crossing Standards. These criteria also apply to any alternate routes. The cleared corridor could encourage the use of ATVs and dirt bikes which can cause erosion and damage streams if they do not use the bridge to cross. How this will be controlled in the period before a rail trail is constructed should be addressed.

3. Contamination. The DEIR should contain a thorough analysis of the rail bed ballast and soils for environmental contaminants, and a plan for how to protect the surrounding environment and water resources from these contaminants, including removal and immobilization. MA DEP's Best Management Practices for Controlling Exposure to Soil during the Development of Rail Trails (Eversource EFSB filing Appendix 5-3) was reference by Eversource for guidance for final grading, restoration, and demobilization (Eversource EFSB filing Section 5.5, Page 5-16). The BMPs do not provide guidance for the extensive excavation and soil removal associated with the duct bank and splice vault construction.

4. Vegetation management—*invasive plants*. The proponent needs to confirm that no fill would be introduced to any work sites that could contain the seeds, roots or other viable material from invasive species. The ENF states that where the clearing for construction is wider than the final 22-foot width, “these areas will be allowed to grow back” (pg. 5). Instead, the proponent should plant and maintain appropriate native vegetation in order to insure that invasive plants don’t take hold. Large trees should be physically protected from damage by construction equipment and replaced where damaged with trees of comparable ecological value.

5. Vegetation management—*long-term*. The use of herbicides along the route of the transmission line should be avoided, and mechanical methods used to maintain the corridor. Short- and long-term impacts of herbicide use should be fully described in the DEIR. The impacts on wildlife, particularly sensitive fish species, and on local drinking water wells should be evaluated. The use of herbicides as a long-term management technique is particularly problematic due to the repeated exposure over many years or decades.

6. Stormwater. There should be no discharge of pollutants into the stormwater runoff of the corridor, whether chemical, salt, sand or silt, oil, thermal (see below), or other contamination. During construction it is essential that equipment neither deposit contaminants nor disturb the soil in such a way that contaminants are released beyond the immediate construction area. Vernal pools should receive special protection. Wherever possible green infrastructure should be used to capture, treat and recharge all stormwater on site.

7. Thermal impacts. The 22-foot wide corridor would be hotter in the summer than the route that is currently completely shaded due to the grown-in trees. Measurements of changes in stormwater runoff temperatures should be provided along with the impact on stream temperatures. The coldwater fishery resource streams should be shown as such on project maps.

To damage one of the few remaining healthy wild brook 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.

Thank you for the opportunity to comment on the ENF for the proposed project. We hope that the DEIR will fully assess alternatives to the currently proposed route. We have very few ecologically-rich protected areas left and should make every effort to avoid degrading them in any way.

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



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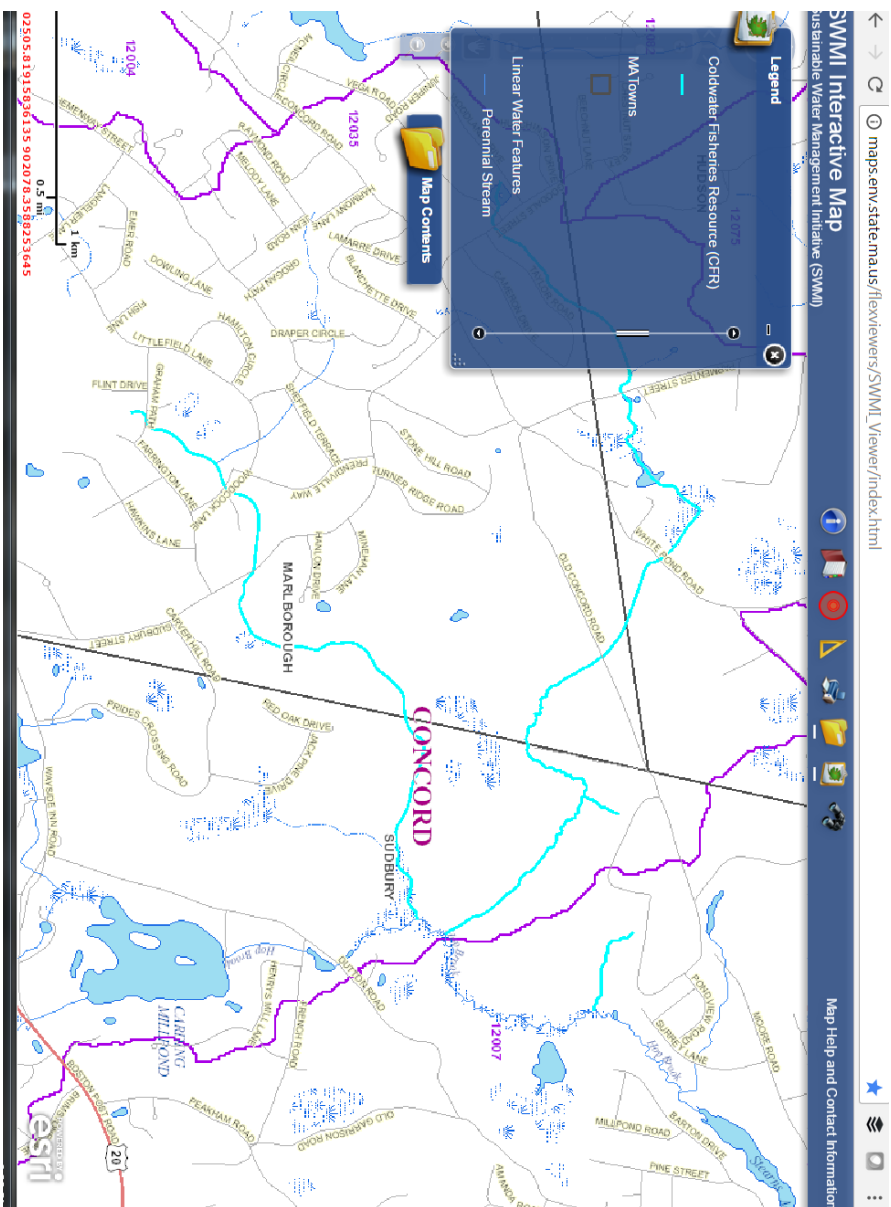
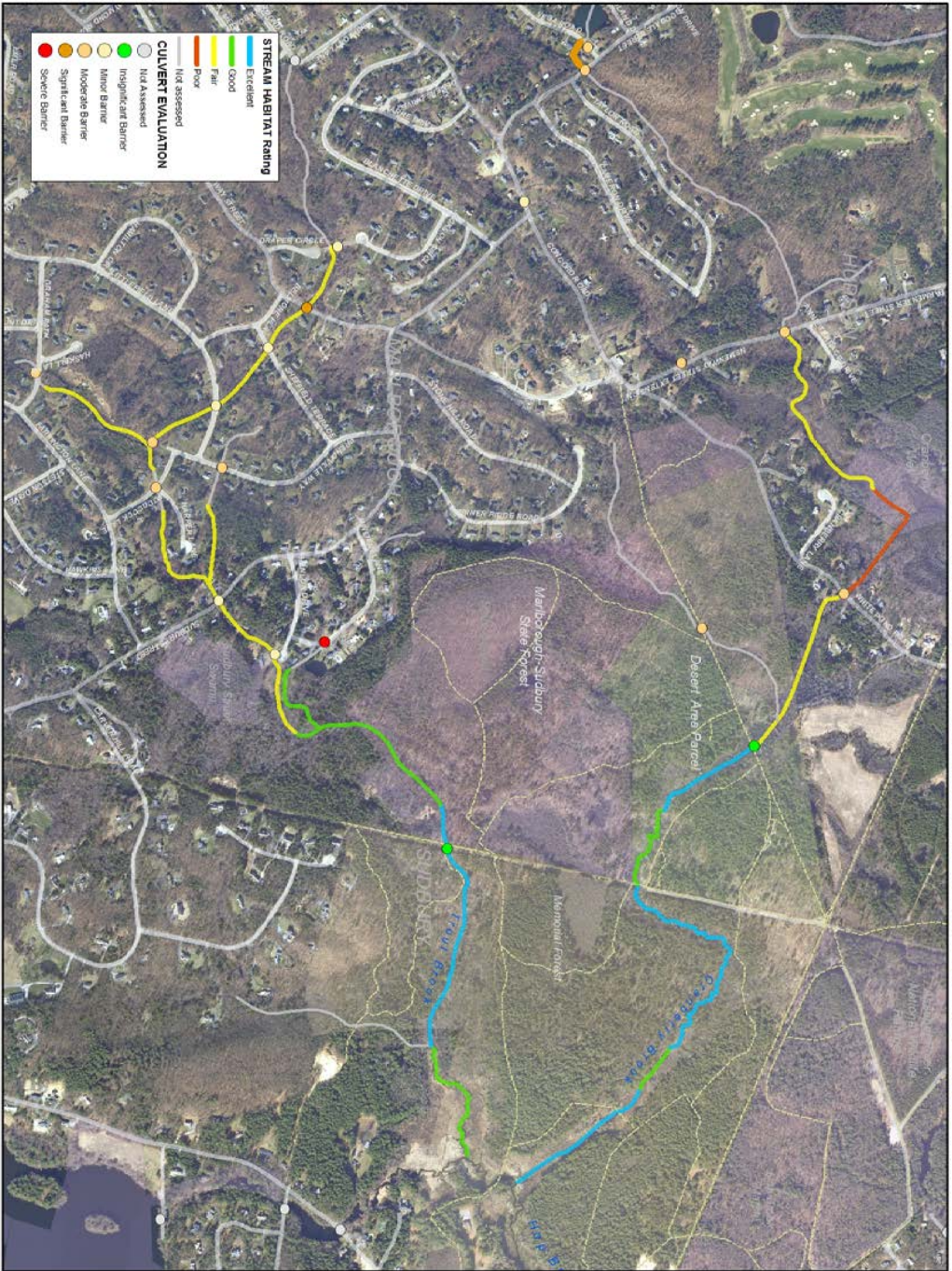


Fig. 1 Coldwater Fishery Resources

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

Fig. 2 Habitat assessments