Protect Sudbury

July 4, 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

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

Dear Ms. Czepiga:

In the matter of the Eversource Sudbury-Hudson transmission line project, to date, Eversource has only filed an ENF 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 to date for an underground route with multiple complications including changing elevations of +/- 15 feet or more, considerable amounts of bedrock, and wetlands. These complications could lead the EFSB to reconsider the aboveground line with its additional associated environmental impacts. Because the above ground option has not been ruled out either by Eversource or the EFSB, Eversource should be required to file an ENF and EIR for it. Without ENFs for all three proposed options, there is no way that the state agencies can effectively assess environmental impact.

By Eversource’s own assessment in the EFSB filing, the under-street route has virtually no environmental impact, and evaluation of the current filing should take that into consideration. In the absence of an ENF for the under-street route, there would be no formal statement of its impact, and therefore state agencies would be unable to effectively compare each route in the existing filing. As MEPA requires state agencies to take all feasible measures to avoid, minimize and mitigate damage to the environment, MEPA should require an ENF for all three

routes. This would allow state agencies fully scrutinize the impacts of all three routes and understand that the in-street option avoids and minimizes the enormous environmental impacts of both MBTA routes with likely no mitigation required.

Of particular concern is how transmission lines will be constructed through water crossings, as there is major potential for harm to species and disruption of wetlands and waterways. The MEPA scoping site visit looked at a very small section of the MBTA route, thus underplaying the significant impact of the project. MEPA should require all state agencies involved to conduct a more thorough examination of the entire route, accompanied by the Sudbury and Hudson Conservation Commissions as they are intimately familiar with the area and can best provide information that others would miss.

Given that there are multiple viable under-street options with virtually no environmental impacts as well as a solution from NGRID, which simply upgrades existing infrastructure, MEPA needs to conduct careful analysis of Eversource's route selection methodology. The scoring system is severely flawed in its weighting of impacts and inclusion of impact on "built environment" and "constructability" in assessing environmental impact. Several of the weighting scores are also flawed, in particular, valuing impact on conservation land, which will be permanent, as a 3 out of 5, where as temporary traffic disruption is a 5. Because of this, it appears that routes that are entirely viable, with minimal impact on the natural environment were eliminated early in the process and are not therefore being assessed for comparison to the impacts of the MBTA ROW routes. The MBTA routes should both be rejected outright, in keeping with the Commonwealth's Sustainable Development "Smart Growth" Principles that discourage new construction and disturbance within natural areas.

Dozens 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 Fish and Wildlife, and others have expressed alarm at the MBTA routes – both overhead and below ground.

MEPA needs to ensure that all agencies are FULLY cognizant of the concerns from these esteemed environmental groups and the environmental consequences of both the aboveground and below ground along the MBTA right of way:

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 are home to several threatened and endangered species of plants and animals. The town of Sudbury has invested over $25 million since 2001 to protect some of these spaces, in addition to sums spent by private land trusts (Sudbury Valley Trustees), the State and Federal governments.

Among the species and habitats at risk are Eastern Brook Trout, a great blue heron rookery, the blue spotted salamander, wood turtles, Eastern Box Turtle, 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 and the MBTA right of way routes put these at risk and:

- Create conditions unsuitable for certain wildlife species including impacts to isolated populations, altered wildlife behaviors, decline of resident species, disruption of movement corridors, increase in habitat fragmentation, edge effects
- Allows entry of invasive species and a pathway for predators
- Large, interconnected areas of forestland and wetlands are vital for ecological health and integrity, and the MBTA routes bisect these connected spaces.
- Destruction of unusual plant populations
- Disturbance and alteration of breeding habitat of recently state-listed whip-poor-will.

2) Large-scale permanent destruction of conservation lands from irreparable immediate and ongoing damage by construction and maintenance

3) Negative impacts from use of herbicides to environmentally sensitive areas. No details of the full vegetation management plan have been provided.

4) Potential for ground-water pollution from toxic chemical cocktails of herbicides

- 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

and the state of California. We can't risk taking a chance with the health of the population of the impacted towns.
- 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.
- The proposed route is in close proximity to five certified (and an additional five with certified data collected) vernal pools containing the species in question

5) Likely increase of unauthorized uses of ATVs and dirt bikes, which cause significant damage to natural resources

6) Destruction and/or contamination of highly important water resources important to humans and wildlife, including wetlands and rivers. Sudbury is a low lying area with extensive river resources, five of which run near or under the MBTA ROW route. Those five rivers are the Sudbury River, Landham Brook, Dudley Brook, Wash Brook, and Hop Brook. These wetlands and water sources provide ground water filtration, flood control, cold water fisheries, and drinking ground water for this region.

- Impact on threatened and vulnerable Eastern brook trout habitat in the Sudbury River tributaries by diminishing shade cover due to tree clearing, warming of river temperatures and potential pollution from construction activities and herbicide usage. A full wetlands impact of the loss of shading needs to be included.

- The proposed transmission line crosses over Zone II areas in Sudbury and the Cranberry Bog Well in Hudson. Potential pollution by any herbicides or other runoff from construction activities 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. Sudbury's wells are located in an aquifer with a high vulnerability to contamination due to the absence of hydrological barriers that can prevent contaminant migration.

- 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. Details of disposal of excess soil generation and methods of screening for hazardous materials need to be specified.

7) According to Mass Audubon, mitigation of these impacts is not feasible. Eversource's mitigation measures such as "financial contribution toward land acquisition" cannot mitigate for permanent loss of wildlife habitat and loss of life.

Given the scale and severity of these impacts, permitting for this project should be denied, but at the very least, an EIR for all three proposed routes should be required to address all of the above concerns. In addition, all items marked TBD in the ENF need to be presented with details.

Thank you,

Raymond Phillips

President, Protect Sudbury Inc.