

July 4, 2017

ELECTRONIC DELIVERY

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: NSTAR Electric Company d/b/a Eversource Energy, ESFB 17-02

Dear Ms. Czepiga:

Please accept my comments on the Environmental Notification prepared by VHB for the Eversource Sudbury-Hudson Transmission Reliability Project. I am a 30 year resident of Sudbury and a direct abutter to the proposed project.

Sudbury is fortunate to have a plentiful supply of groundwater that sustains (primarily through one well field) its public water supply. Over the years, the Town of Sudbury and Sudbury Valley Trustees have acquired surrounding wetlands along the rail line in order to protect these groundwater flows. Under state regulations governing public water systems at 310 CMR 22.00, the "Zone 2", the "zone of contribution" is to be protected by various means including acquisition and zoning. Sudbury has enacted several such bylaws to protect its aquifer, floodplains and wetlands. The streams that originate in the Memorial Forest area feed the Raymond Road wellfield. They are remarkable for their clarity and sustain cold water fisheries due to their cool subsurface origin. The Town is fortunate to have such protected resources. What I find particularly disturbing is the Petitioner's ignorance of these facts and even those contained within their own petition.

For example, the petitioner clearly indicates in their filing that the 9.1 mile railroad right of way is likely to be highly contaminated due to its history as a railroad. In Appendix 5-3, Page 2 of 11 they reference DPU's own guidelines with respect to rail bed contamination.

"Some historic railroad operations involved the use of chemicals that may have resulted in presence today of contamination. The most commonly reported contamination along rail line includes metals, pesticides (such as lead arsenate), and constituents of oil or fuel (petroleum products). These chemicals have been associated with normal railroad operations and are likely to be found anywhere along the line. For example, it would not be uncommon to find arsenic (up to ten times natural background levels) present in the soil along a right-of-way from old railroad ties dipped in an arsenic solution, arsenic weed control sprays, and arsenic-laced slag used as railroad bed fill. Lubricating oil and diesel that dripped from the trains are likely sources of the petroleum product found along the lines. Other sources of contaminants associated with historic railroad operations may include coal ash from engines, creosote from ties, and polynuclear aromatic hydrocarbons ("PAHs") from the diesel exhaust."

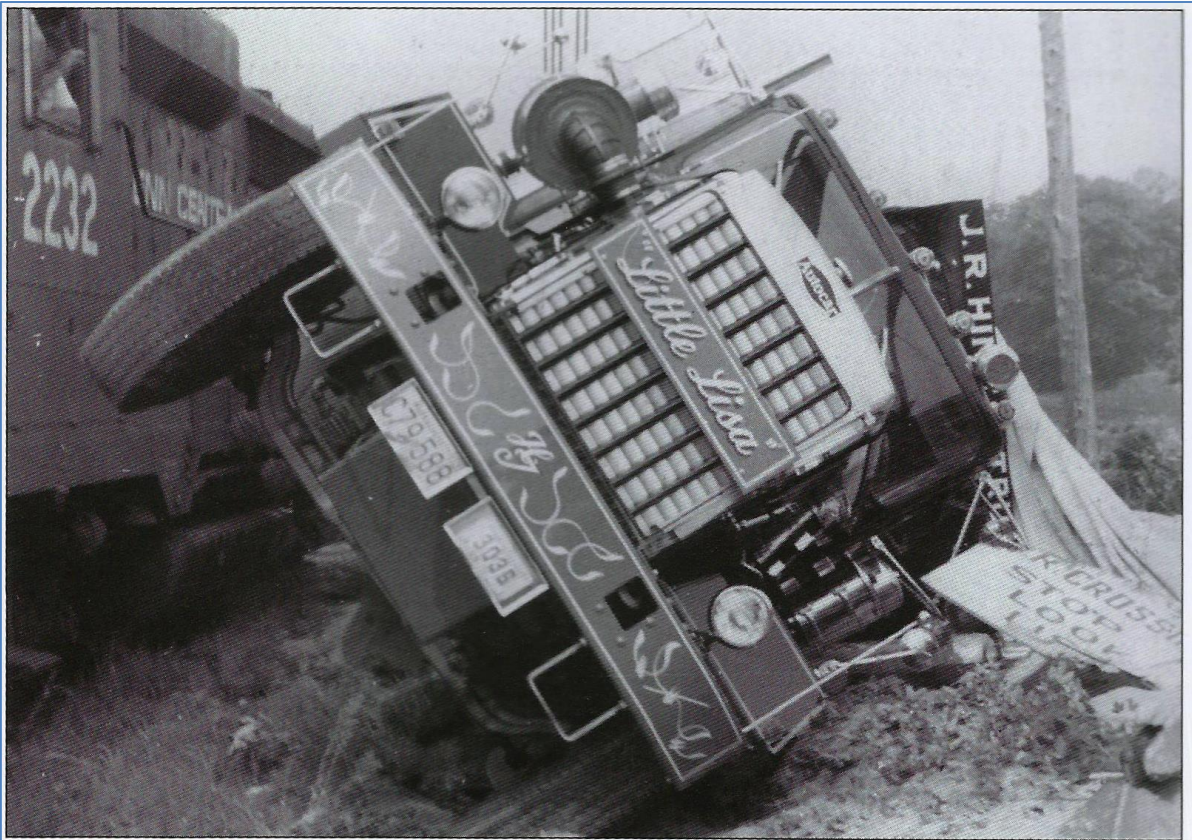
The question is not, if the rail bed is contaminated, rather it is, how much contamination exists and to what degree. The petitioner ignores the history and nature of this land throughout their petition, particularly with respect to the potential impact upon the local water supply.

The former Central Massachusetts was an active rail corridor for close to 100 years. (1881 to ~ 1980). In fact, the South Sudbury Union Station was the intersection point between the Central Mass line and the Framingham and Lowell line, thus making South Sudbury one of a small number of stations which served both of New England's two largest and busiest railroads. The crossing point ('diamond crossing') these two lines is still visible today. (see photo below)



“Diamond Crossing” South Sudbury Station 2016

These diamond crossings were inherently dangerous and were often the point at which major accidents occurred, usually resulting in overturned locomotive engines and freight cars potentially handling highly toxic materials. After a review of the literature regarding the history of this railroad such accidents have occurred at this specific location as well as others along this 9.1 mile stretch of the railroad. One such accident occurred in Sudbury in 1955. See image below.



The new truck "Little Lisa" ran into a train, resulting in this unique photograph at the intersection of the B&M railroad line at 394 Boston Post Road in 1955. George Halloran used to be the gatekeeper for the crossing, which was extremely dangerous. The railroad provided a little white shack for him to sit in with a heater, and when a train came, he would crank down the gates to stop traffic. This accident happened after he was laid off without a replacement.

The presence of both the known and unknown contaminants on this 9.1 mile stretch, poses a significant threat to both the Town of Sudbury's drinking water supply. The proposed construction technique on the 'preferred' route is the trenching of a 4' x 5' area running the length of 9.1 miles. The Petitioner intends to dig up this contaminated soil and then placing it back into the trenched area. This would then create a more permeable surface and an easier path into the underlying groundwater. This disruption will facilitate the release of both the existing rail bed contaminants as well as other know contaminants into the water table. In fact, within Sudbury, the 'preferred' route will intersect the Wellhead Protection Area for the Raymond Road Aquifer, which supplies five of the town's wells. (Appendix 5-7; page 2)

These are the same wells that have had a history of contamination that originated from a former Raytheon site located in close proximity to the railroad bed. These are the same wells that the Massachusetts Department of Environmental Protection noted in their Source Water Assessment and Protection (SWAP) report prepared for the Town of Sudbury in 2002 noted as being "located in aquifers

with a high vulnerability to contamination due to the absence of hydrogeologic barriers (i.e. clay) that can prevent contaminant migration.”

In 1990 and 1991, groundwater testing revealed trichloroethene (TCE) near the eastern border of the rail bed in what was the former location for a Raytheon property. TCE is classified as a toxic substance and carcinogen.

In 2007 and 2008, testing found TCE in the groundwater, prompting the DEP to issue another advisory because the Raytheon property is near the town’s Raymond Road drinking water well field. According to documents in the public domain, the DEP issued a temporary solution for the contamination, ordering the company to monitor the groundwater every five years because it is close to the well field. In 2013, the testing also revealed Freon 11 in the groundwater, according to a report. Ultimately, according to the Superintendent of the Sudbury Water District the TCE contamination did reach one of the Raymond Road wells resulting in constant monitoring and ongoing costly water treatment techniques. Also, disturbing is that the Sudbury Water District cannot possibility test for all potential forms of contamination. It is more probably than not, that the contamination would go undetected for years until sickness developed in the population and was then finally traced back to the drinking water.

The potential for the already identified contamination, along with other unknown contamination to reach these wells is significantly increased through both the proposed construction techniques as well and the planned removal of ~ 22,000 trees along this 9.1 mile stretch. A typical large tree, on average, retains approximately 100 gallons of water. With this magnitude of tree loss, as much as 2.2 million additional gallons of water will flow through the now more permeable surface of the rail bed and into the water table. These additional gallons of continuous flow into the ground water table and through areas of contamination already identified as ‘high risk’ by DPU in their 2002 SWAP report, will in all likelihood result in a level of contamination at the well heads that cannot be remediated and that will adversely impact human health.

Either the underground or aboveground utility line proposals that follow the MBTA right-of-way would have significant negative environmental impacts. Please require that Eversource outline the environmental impacts of a street-based alternative, should a line indeed prove necessary, in existing public ways as was done several decades ago when the Sudbury power station was constructed. We are confident that a comparison of the environmental impacts of these alternatives will reveal the significant short-term and lasting environmental impact of a line that follows the MBTA right of way.

Sudbury has a rich Native American history with countless documented and yet to be documented historic and religious Native American sites. Eversource’s EFSB petition and ENF provides, at best, a cursory overview of a number of such sites. Upon even a brief review of the historical information available, it is clear that numerous Native American sites of significant historic and religious importance exist either on or adjacent to the MBTA ROW. (Please see enclosed excerpt from “The History of Sudbury – 1638 – 1889” by Alfred Hudson) I request that a full and complete accounting of these sites be included in the requested EIR.

Finally, 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.

Thank you again for considering these comments as MEPA determines the scope for the environmental impact analysis.

Regards,

Raymond Phillips  
40 Whispering Pine Road  
Sudbury, MA 01776

Excerpt from:

THE  
HISTORY OF SUDBURY,  
MASSACHUSETTS.  
1638 - 1889.  
BY  
ALFRED SERENO HUDSON.

In several such spots in Sudbury, various relics have been found, notable among which is one by the river meadow, just east of the Jonathan Wheeler place. It is between the meadow margin and the Water Row road, and has an area of one or two acres. It is a light, sandy upland, in places, almost or quite without sod. Arrow-heads and plummets have been found there in abundance, and of a kind of stone unlike any native to the neighborhood. These relics have not only been unearthed there by the plow or spade, but some have been uncovered by the wind. Another place where relics have been found in abundance is on the Coolidge estate, by the Lanham Meadows, a little south of the East Sudbury depot. This spot is also of a light, sandy soil, and has a sand pit within it. A little farther north in this district, on the Frank Walker estate, arrow-heads and parts of a mortar or stone kettle were found ; while southerly of Lanham Brook, on the Albert Larkin estate, on an upland some rods west of the house, arrow-heads have been quite numerous.

Another place worthy of mention is at South Sudbury, on the east side of Mill Brook, on what was lately the farm of Israel How Brown. The spot is a little southeasterly of a rock by the brook called " Great Rock," and midway between that and the Goodnow Library. On this place, which is a light, loamy upland, within the space of a few rods have been plowed up quite a quantity of loose, discolored stones, that look as if they had been subjected to the action of fire, and also coal and charred pieces of wood. The nature of the

place at South Sudbury is such as would be favorable to Indian occupation. Before the mill was erected there was probably quite a fall to Hop Brook, and for some distance the shoal, sparkling stream might form a fine fishing place in the season of the alewives or shad.

In the west part of the town, at a sandy spot between the Solomon Dutton and Otis Parmenter places, Indian relics have also been extensively found.

At North Sudbury there were likewise indications of the presence of these former inhabitants. Says Mr. John Maynard, " I have found on my land, east of Cedar Swamp, a stone axe, part of a tomahawk, a gouge, chisel, flaying knife, and other strange things ; also about four hundred heads, one-half of them broken. I have plowed over seven or eight collections of paving stones that were discolored by fire, that I suppose were the hearthstones of Indian wigwams."

There are some parts of the town which we will especially notice as being places that were perhaps occupied by the Indians in considerable companies. These are the neighborhood of Nobscot, the River, Weir Hill, and Cochituate Pond.

In the vicinity of Nobscot there is little doubt but that Indians once made their homes ; as tradition, record and relics give evidence of it. As we shall notice further on, a noted Indian by the name of Jethro had a wigwam near there, and it is supposed the Indians had a lookout there. At the base of the hill, along the plain land, on the estate of Hubbard Brown, by the brook, and also on the land south of the Framingham road, more or less stone relics have been discovered.

The old " Indian wash-bowl," so called, is pointed out in a field about east of the hill. This is an excavation shaped like a wash-bowl, formed in a large rock, and may have been made by nature or art. Probably it was never used as a washing place by the Indians, but, if made or used by them at all, it may have been for grinding corn.

That the Indians largely frequented the neighborhood of the river is quite evident. They probably lived along almost its whole course, as relics of them have been found here and there from one bound of the town to the other. On the east side of the river was an Indian burial place. (See chapter on

cemeteries.) An Indian skeleton has been exhumed by the roadside at Sand Hill. This was discovered when the road was built, by a person who was passing by. He drew it from the bank, together with several Indian relics. The "old Indian bridge" was supposed to be southerly of Sand Hill, over West Brook, and formed a crossing in the direction of Heard's Pond. The home of Karte was not far from the river. From his wigwam home on the hill, he could easily reach the mooring place of his birch canoe, or look down upon the expanse of broad meadow lands, green with their covering in Summer, or brown with the frosts of Fall.

Perhaps catch a glimpse of the canoe of Tahatawan as it glided up the Musketahquid.

But the places where it is supposed the Indians were more numerous than at any other point along the river were toward the town's northeast bound. Near this point were fording and fishing places. One of these was at Weir Hill, below Sherman's Bridge. The very locality of this place is favorable for Indian occupancy. It is situated at a point of the river where, as we have been informed, at low water the river can be forded. On its opposite bank a hill extends almost to the stream, and on either side the meadow bank is hard, which is a circumstance rare on the river course. At this place tradition says there was an Indian fishing weir, which old inhabitants state was about northeast of Weir Hill ; and from this the hill has derived its name. The fishing weir was an important thing for the Indians, as by means of it large quantities of fish could be taken. The principle of construction was the placing across the river of an obstruction, as perhaps some kind of a fence, which, running diagonally from either bank to the centre of the stream, left a small aperture at the apex, where the fish could be taken in a wicket work or net. Such an apparatus, at a favorable place on the river, would supply fish for a considerable village. These fish served not only a present purpose, but were dried and preserved for future use. Another inducement for Indians to locate in this part of the town was a good fording place just below Weir Hill, which is at or near a small hill called Mount Headley, and is between the river and the county road. That this locality was improved by the Indians is evident from the quantities of relics that have been found

there. Both about here and at Weir Hill more or less of these have been picked up ; and, at the latter place, their hearthstones have been unearthed by the plowshare, with the coals still upon them.

As has been stated, there are indications that the Indians once dwelt in considerable numbers about Cochituate Pond. The region about there was favorable to Indian occupation, not only on account of the lake itself, but because of its nearness to the falls of Sudbury River (Saxonville). The name of the locality has been spelled Wachittuate, Cochituet, Chochichawicke, Coijchawicke, Catchchauitt, Charchittawick, Katchetuit, Cochichawauke, Cochichowicke. The word as now spelled is found in a record dated 1644, in connection with laying out the Glover farm. 44 The southwest bounds are the little river that issueth out of the Great Pond at Cochituate ." This record, as well as others, also shows that originally the term was applied, not to the pond, but to the region near the outlet. Temple states that the word signifies, "place of the rushing torrent," or, 44 wild dashing brook." On the westerly side of the pond was an Indian fort, and, near by, a permanent settlement.