



Sudbury Valley Trustees

*Conservation, Collaboration, and Community since 1953*

June 30, 2017

Executive Office of Energy and Environmental Affairs

**Attn: MEPA Office**

**Page Czepiga, EEA No. 15703**

100 Cambridge Street, Suite 900

Boston MA 02114

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

Dear Ms. Czepiga:

Please accept our comments on the Environmental Notification prepared by VHB for the Eversource Sudbury-Hudson Transmission Reliability Project.

Sudbury Valley Trustees (SVT) is an abutter to the project, owning 4,000 linear feet along the MBTA right-of-way that is being proposed by Eversource as their "Primary Route." This 220 acre SVT property is known as the General Federation of Women's Clubs Memorial Forest (commonly known as "Memorial Forest"). SVT has managed this land and abutting conservation lands owned by the Women's Federation for over 20 years. Additionally, as a regional conservation organization, SVT's mission is to protect natural areas and wildlife habitat throughout a 36-town region west of Boston.

The Primary Route, as well as the Noticed Variation, both located along the MBTA abandoned rail line, will severely impact a globally rare natural community, several listed rare species, a rich assemblage of wetland resource areas, and hundreds of acres of conservation lands that were protected with local, state and federal tax dollars, and the scenic character of this wilderness area located only 25 miles from Boston.

The Desert Natural Area, south of Hudson Road, in the City of Marlborough and Town of Sudbury is comprised of 900 acres of high quality conservation lands composed of a diverse mix of forests, barrens, wetlands and cold water streams. **Pitch Pine-Scrub Oak Barrens are recognized as a globally unique natural community that hosts 32 state-listed species plus eight "species of Greatest Conservation Need" as defined by the Massachusetts State Wildlife Action Plan.**

These 900-acres, along with the additional 2,300 acres of national wildlife refuge located north of Hudson Road, create an incredible wilderness that supports a great diversity of wildlife and a recreational resource for thousands of people in the Metrowest region. The United States Government, Commonwealth of Massachusetts, Town of Sudbury, City of Marlborough and SVT have invested a tremendous amount of public and private resources in the acquisition and management of these lands. Over the last 25 years these conservation owners have worked in partnership to clean up what used to be a dangerous back land of shooting sprees and burning cars.

Today, one can find safe and well-maintained trails, cold water streams that support native brook trout and a diverse array of wildlife habitats including pitch pine-scrub oak barrens.

The entire length of the proposed Eversource underground route that runs through this area is part of a **Priority Habitat for rare species**. Those species include whip-poor-will, Eastern box turtle, and blue spotted salamander. Whip-poor-wills have declined precipitously at the Desert Natural Area over the last 30 years. In a survey conducted by the Lloyd Center for the Environment in 2015, SVT documented the presence of three state-listed moth species: Pine Barrens Zanclognatha (*Zanclognatha Martha*), Coastal Swamp Metarranthis (*Metarranthis pilosaria*), and Gerhard's underwing (*Catocala herodias gerhardi*). The **only whip-poor-will** that has been heard calling in the last three years of surveys has been next to the MBTA ROW, by the three-town junction. Additionally, the **ONLY** remaining population in this area of the **watch-listed species wild lupine** is located on the MBTA ROW at the three-town junction. Both the above and below ground option on the ROW will destroy this lupine population and directly disrupt breeding habitat of the whip-poor-will.

Please see our additional comments detailed in our letter to the Energy Facilities Siting Board, attached.

The Eversource proposed powerline along the MBTA ROW will jeopardize the ecological integrity of this precious resource in myriad ways. We request that MEPA direct Eversource to address the short (aka "temporary" construction impacts) and long-term, recurring impacts of the following issues associated with its preferred alternative as well as a street-based and no build alternative in its Environmental Impact Report.

1. Impact on globally rare pitch-pine scrub oak natural community and restoration efforts at this site.
2. Impact on the known rare species present at this site including whip-poor-will, blue-spotted salamander, Eastern box turtle, wood turtle, Pine Barrens Zanclognatha (*Zanclognatha Martha*), Coastal Swamp Metarranthis (*Metarranthis pilosaria*), Gerhard's underwing (*Catocala herodias gerhardi*) and the watch-listed wild lupine.
3. Impacts on wetlands, vernal pools, streams and public water supply. Eversource must finalize wetlands delineations. The most recent corrections to the Environmental Notification appear to erroneously suggest that the wetlands impacts do not meet regulatory thresholds. Based on personal knowledge and analysis of the site, it is clear that significant wetlands resources will be impacted. Further, Eversource must describe changes in both hydrology and temperature that will be expected as a result of permanently removing the forest canopy along the corridor.
4. Impact of long-term use of herbicides on flora, fauna and water quality.
5. Impact of invasive species that may be brought onto the site inadvertently in fill material and invasive plant introduction that typically occurs after major soil disturbance such as this type of construction.
6. Impact of higher rates of predation on ground nesting species including turtles and whip-poor-wills due to the presence of a new movement corridor for common predators such as skunk, raccoon, and fox.
7. Impact of increased "edge effects" created by this long corridor which disrupts the continuity of habitats and alters micro-climates. The rate of brown cowbird nest parasitism is documented to increase along these types of edges.
8. The impacts of increased disturbance and reduced resilience of important habitat in light of climate change. Significant changes in climate require conservation land managers to

reduce disturbances in order to ameliorate the potential significant impacts of increased storm intensity and droughts.

9. Impacts from potential increase in illegal motorized vehicle use. These types of utility corridors are known to increase the use and facilitate the access by illegal ATVs, which are already a problem at this site.

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.

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 you outline the scope for the environmental impact analysis.

Sincerely,



Lisa Vernegaard  
Executive Director

enc: SVT letter to EFSB dated June 15, 2017

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  
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, EFSB  
Melissa Murphy-Rodrigues, Town Manager, Town of Sudbury

Tom Moses, Executive Assistant, Town of Hudson  
Arthur Vigeant, Mayor, City of Marlborough  
Alison Field-Juma, OARS  
Protect Sudbury  
Protect Hudson  
Gary Crago, Greater Boston Trout Unlimited



Sudbury Valley Trustees

June 15, 2017

Stephen August, Esq., Presiding Officer  
Energy Facility Siting Board  
One South Station  
Boston, MA 02110

By email to: [dpu.efiling@state.ma.us](mailto:dpu.efiling@state.ma.us); [Stephen.August@state.ma.us](mailto:Stephen.August@state.ma.us)

Re: Public Comment Hearing – EFSB 17-02/D.P.U. 17-82/17-83  
Eversource Proposed 115kV line from Sudbury to Hudson

Dear Presiding Officer August:

Please accept and enter Sudbury Valley Trustees' written comments on the above-captioned proposal as part of the administrative record of the Public Comment Hearing for the referenced three (3) petitions filed by Eversource with the Energy Facilities Siting Board ("EFSB").

Sudbury Valley Trustees (SVT) is an abutter to the project, owning 4,000 linear feet along the MBTA right-of-way that is being proposed by Eversource as their "Primary Route." This 220 acre SVT property is known as the General Federation of Women's Clubs Memorial Forest (commonly known as "Memorial Forest"). SVT has managed this land and abutting conservation lands owned by the Women's Federation for over 20 years. Additionally, as a regional conservation organization, SVT's mission is to protect natural areas and wildlife habitat throughout a 36-town region west of Boston.

We strongly oppose both the proposed Primary Route (underground) along the MBTA and the noticed variation (above ground). The Primary Route will severely impact a globally rare natural community, several listed rare species, a rich assemblage of wetland resource areas, hundreds of acres of conservation lands that were protected with local, state and federal tax dollars, and the scenic character of this wilderness area located only 25 miles from Boston.

We strongly encourage the EFSB to direct Eversource to use the Noticed Alternative route along existing public roads. While the short-term financial cost of the roadways alternative may be higher, this option does not trigger the significant short and long-term environmental impacts generated by the MBTA routing option.

The Desert Natural Area, south of Hudson Road, in the City of Marlborough and Town of Sudbury is comprised of 900 acres of high quality conservation lands composed of a diverse mix of forests, barrens, wetlands and cold water streams. **These 900-acres, along with the additional 2,300 acres of national wildlife refuge located north of Hudson Road, create an incredible**

**wilderness that supports a great diversity of wildlife and a recreational resource for thousands of people in the Metrowest region.** The United States Government, Commonwealth of Massachusetts, Town of Sudbury, City of Marlborough and SVT have invested a tremendous amount of public and private resources in the acquisition and management of these lands. Over the last 25 years these conservation owners have worked in partnership to clean up what used to be a dangerous back land of shooting sprees and burning cars. Today, one can find safe and well-maintained trails, cold water streams that support native brook trout and a diverse array of wildlife habitats including pitch pine-scrub oak barrens.

**Pitch Pine-Scrub Oak Barrens are recognized as a globally unique natural community that hosts 32 state-listed species plus eight “species of Greatest Conservation Need” as defined by the Massachusetts State Wildlife Action Plan.** Chris Buelow, Restoration Ecologist with the Massachusetts Natural Heritage & Endangered Species Program, offered his opinion of the Desert Natural Area through which the proposed Eversource utility would run:

"Inland Pine Barrens such as those occurring in the Desert Natural Area are globally rare natural communities and represent one of the highest conservation priorities in Massachusetts for preserving regional biodiversity. Unfortunately, the majority of Inland Pine Barren communities that remain in the state are now highly degraded due to nearly a century of fire suppression across the landscape. Considering the rarity of this community-type and its general continued decline across its range, it's very exciting to see the restoration and management efforts that are taking place at The Desert. Opportunities to restore functioning Inland Pine Barren communities have become increasingly rare across the Northeast, making the work undertaken at The Desert an important project in the regional conservation of this important resource."

The Desert Natural Area is part of an **Important Bird Area** designated by MassAudubon. Additionally "SVT's pitch pine-scrub oak restoration project will help stem the decline of bird species that depend on early successional habitat, such as the Eastern Whip-poor-will, Prairie Warbler, and Brown Thrasher. Early successional habitat is a natural component of pitch pine-scrub oak forests, and thoughtfully applied forestry and prescribed burns can effectively restore the ecological function in these systems." (Jeff Ritterson, Forest Conservation Bird Fellow, MassAudubon)

Since 2009, SVT's members and the City of Marlborough have invested tens of thousands of private and public dollars in habitat restoration of this unique resource. These efforts have been supported by grants from the USDA Natural Resources Conservation Service, National Fish & Wildlife Foundation, Massachusetts Division of Forestry, MassWildlife, and the Sudbury Foundation.

The entire length of the proposed Eversource underground route that runs through this area is part of a **Priority Habitat for rare species**. Those species include whip-poor-will, Eastern box turtle, and blue spotted salamander. Whip-poor-wills have declined precipitously at the Desert Natural Area over the last 30 years. In a survey conducted by the Lloyd Center for the Environment in 2015, SVT documented the presence of three state-listed moth species: Pine Barrens Zanclognatha (*Zanclognatha Martha*), Coastal Swamp Metarranthis (*Metarranthis pilosaria*), and Gerhard's underwing (*Catocala herodias gerhardi*). The **only whip-poor-will** that has been heard calling in the last three years of surveys has been next to the MBTA ROW, by the three-town junction. Additionally, the **ONLY** remaining population in this area of the watch-listed species wild lupine is located directly in the center of the MBTA ROW at the town junction of Hudson, Marlborough and Sudbury. Both the above and below ground option on the ROW will destroy this lupine population and directly disrupt breeding habitat of the whip-poor-will.

The proposed power line on the ROW will impact significant wetland resource areas. As summarized by the Town of Sudbury's Conservation Coordinator, Debbie Dineen, the proposed underground route abuts five certified vernal pools plus five vernal pools which have been documented to support vernal pool breeding amphibians. The utility line will cross Hop Brook plus 7 other perennial streams. These deteriorating railroad bridges will require reconstruction adding to direct wetland habitat destruction and disturbance.

Based on SVT's experience, utility companies have an inconsistent (at best) track record for the management of their rights of ways. They typically hire contractors to conduct clearing and herbiciding work and they do not adequately supervise those contractors. SVT has experience with Eversource where their utility line bisects conservation land that we and the Ashland Town Forest own. In that instance the contractors were "blowing" wood shrapnel into the abutting trails while people were walking the trails because they failed to notify the landowners or put up signage. In the case with the Kinder Morgan gas pipeline that bisects the Desert Natural Area running north-south, their contractors plowed through two streams even though they had just been instructed to only use hand tools at stream crossings. A year later, we are still waiting for them to restore the stream banks and wetland areas.

Eversource claims that their proposal to run an underground utility along the MBTA ROW will meet the Town of Sudbury's Master Plan goals of creating an East-West rail trail. These two projects have distinctly different impacts, footprints and purposes and should not be considered together.

The Eversource proposed powerline along the MBTA ROW will jeopardize the ecological integrity of this precious resource in myriad ways:

1. Significantly alter the wilderness character of this natural area treasured by thousands of residents of Metrowest Boston and beyond;
2. Undo the tremendous financial investment that has been made by federal, state, and local governments; private foundations, and individuals;
3. Destroy or significantly damage habitat for rare species;
4. Harm wetlands, vernal pools, streams and public water supply by direct alteration, altering hydrological connection or by contaminating water quality through the use of herbicides for long-term management;
5. Create a long, linear open corridor that creates a pathway for invasive plants into the interior, especially during construction. Invasive plants will further degrade the habitat;
6. Because common predators such as skunk, raccoon, and fox are likely to use this corridor, we can expect greater predation on ground nesting species including turtles and several species of birds;
7. The long corridor will also create more "edge effects," disrupting the continuity of habitats and altering micro-climates. The rate of brown cowbird nest parasitism is documented to increase along these types of edges;
8. Increase disturbance and reduce resilience of important habitat in light of climate change. Significant changes in climate require conservation land managers to reduce disturbances in order to ameliorate the potential significant impacts of increased storm intensity and droughts;
9. These types of corridors are known to increase the use and facilitate the access by illegal ATVs, which are already a problem at this site.

The EFSB is charged with evaluating proposed utility sitings “to determine whether the Project would provide a reliable energy supply with a minimum impact on the environment at the lowest possible cost.” (M.G. L. c. 164, Sections 69H and 69J.) Clearly, there is an alternative route, under the paved streets, that does have a minimum impact on the environment. By Eversource’s own admission in materials provided to the public, the Noticed Alternative Route is as reliable and as operationally flexible as the Primary Route, and it has significantly less environmental impact. For the reasons stated above, the Primary Route is not consistent with the public interest of protecting this environmentally sensitive area.

Sudbury Valley Trustees, on behalf of its 3000 members, urges the EFSB to deny Eversource’s petition to construct the power line under either the Primary Route or via a combined overhead/underground design (the Noticed Variation). Only the Noticed Alternative, under the existing streets, should be permitted.

Sincerely,

A handwritten signature in black ink, appearing to read "L. Vernegaard", written in a cursive style.

Lisa Vernegaard  
Executive Director