



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Eastern Massachusetts National Wildlife Refuge Complex
73 Weir Hill Road
Sudbury, MA 01776-1420



July 3, 2017

Executive Office of Energy and Environmental Affairs
Attn: MEPA Office
Page Czepiga, EEA#: 15703
100 Cambridge Street, Suite 900
Boston, MA 02114

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

Dear Ms. Czepiga:

The preferred "Primary Route" for the proposed Eversource Sudbury-Hudson Transmission Reliability Project abuts the Great Meadows and Assabet River National Wildlife Refuges in Sudbury. These refuges, part of the U.S. Fish and Wildlife Service (Service), are managed to conserve wildlife and provide opportunities for the public to engage in wildlife-dependent public use. We have reviewed the Environmental Notification Form (ENF) submitted by Eversource. Our comments are provided in an effort to ensure that the impacts of the development of an underground 115-kV transmission line are adequately and accurately addressed in the Environmental Impact Report (EIR).

The proposed "Primary Route" utilizes an existing abandoned railroad right-of-way that passes by and through preserved conservation lands and priority habitat designated by the Massachusetts Natural Heritage and Endangered Species Program. Eversource has identified a "Noticed Alternative Route" which would run the proposed transmission lines under existing city streets. **Given the vast difference in environmental impacts of these two routing methods, it is imperative that both alternatives be fully evaluated in the EIR.**

The impacts to wetlands and vernal pools along the abandoned railroad right-of-way need to be clearly elucidated. Impacts come from the placement of temporary and/or permanent fill, and the reduction of shading from vegetation removal. **These are high-quality wetlands which, if filled, will be difficult to replicate.** A long-term management plan with native vegetation composition and survival requirements must be identified.

The area that Eversource indicates needs to be kept clear of vegetation (22' wide, no vegetation higher than 15') is wider than would be necessary if the abandoned railroad bed were to be converted to a rail trail. Many rail trails maintain a canopy over the trail, which provides both shade and wildlife habitat. The EIR should describe impacts associated with an increase in habitat fragmentation to migratory birds, and the impact of increased temperatures as a result of the vegetation clearance along the railroad bed.

Additionally, the impact of vegetation clearance on visitors walking on the railroad right-of-way, as well as those specifically engaged in wildlife observation and photography, should be described.

The EIR should include a description of the impacts of the construction of the transmission line and the long-term maintenance of the transmission corridor on the specific land management goals of the adjacent conservation owners, including the Sudbury Valley Trustees, the Department of Conservation and Recreation, and the towns of Sudbury, Hudson and Marlborough.

Specific comments on the ENF follow:

- Page 11. The Service reviews permit applications submitted to the U.S. Army Corps of Engineers for impacts on fish and wildlife.
- Page 13. We appreciate the willingness of Eversource to work with the Service and local land management agencies to develop a vegetative management strategy along the corridor. The Service is willing to engage in an open and constructive dialogue should the proposed "Primary Route" be selected. Please note that we have informed the Energy Facilities Siting Board that we prefer the "Noticed Alternative Route" as it avoids environmental impacts altogether.
- Page 15. The federally-threatened Northern Long-eared Bat may be present in this area. The Service's New England Field Office in Concord, New Hampshire should be consulted.
- Page 64. The map should identify the Great Meadows National Wildlife Refuge.
- Pages 71 and 72. The maps should identify the Assabet River National Wildlife Refuge.

Please contact me at 978-579-4026 or at libby_herland@fws.gov if you have any questions about these comments.

Sincerely,



Elizabeth A. Herland
Refuge Manager