



Sudbury Valley Trustees

Conservation, Collaboration, and Community since 1953

March 28, 2016

Ms. Bev Schultz
Project Manager
Eversource
One NSTAR Way
Westwood, MA 02090

Re: Sudbury to Hudson Transmission Reliability Project

Dear Ms. Schultz:

I am writing to provide comment on Eversource's proposal to construct a new 115 kV power line between Sudbury and Hudson to comply with the mandate from ISO-New England to strengthen the regional electrical grid.

Sudbury Valley Trustees is a regional land trust that owns the 220-acre Memorial Forest. This natural area abuts 4,112 linear feet of the proposed transmission line. Memorial Forest is part of the 900-acre Desert Natural area, which the proposed line would bisect. SVT has been working with five other municipal, state, private, and federal landowners to protect and manage this extraordinary natural area for over twenty years. Memorial Forest and the Desert are home to the globally rare pitch pine-scrub oak barrens community, which in turn hosts several rare and declining plant and animal species. Further, Memorial Forest and the Desert as a whole provide a rare opportunity for visitors to experience a natural area that is free from the effects of industrialization of the modern world. Over the past two decades, SVT and its partners have invested hundreds of thousands of public and private funds in both the protection and restoration of this area – an investment that would be seriously harmed by the construction and maintenance requirements of the proposed overhead line.

Based on these factors, Sudbury Valley Trustees strongly opposes Eversource's proposal to locate an overhead transmission line along an abandoned rail line that is owned by MBTA. If the line is approved as proposed, it will violate the integrity of Memorial Forest and the other conservation lands that abut the right-of-way. While specific plans have not been prepared, impacts would likely include the wholesale destruction or alteration of key natural features in or along the right of way. The following impacts would result from both construction and long-term maintenance activities:

1. Destruction of unusual plant populations.
2. Disturbance and alteration of breeding habitat of the recently state-listed whip-poor-will.
3. Fragmentation of one of the region's largest natural areas. The majority of the natural area is part of a priority habitat designated by the Massachusetts Natural Heritage & Endangered Species Program. The 82.5 foot wide linear clearing required by an overhead power line would alter natural dynamics as well as provide a pathway for predators and invasive plants. Research



Printed with 100% wind power.



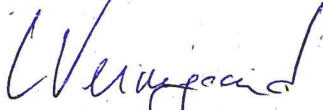
Printed on 100% post-consumer recycled paper.

has shown that the open/low vegetation environment that characterizes powerline corridors can be significant barriers in the movement of many bird, mammal, and amphibian species.

4. Filling and/or disruption of wetland features in and abutting the right of way.
5. Experience shows that utility lines commonly attract misuse by motorized off-road vehicles. This activity causes significant damage to the natural resources.
6. Negative impacts to visitors' experience. Memorial Forest and the Desert as a whole provide thousands of visitors from the region a rare chance to experience a natural area that is relatively free of industrial incursions. An overhead transmission line would harm this experience significantly.

Based on these adverse environmental impacts, SVT urges Eversource, along with municipal and state decision-makers, to revisit below-ground street-based alternative routes that would bypass both public and private conservation lands.

Sincerely,



Lisa Vernegaard
Executive Director

copies by email to:

Governor Charlie Baker

Melissa Murphy Rodrigues, Sudbury Town Manager

Tom Moses, Executive Assistant, Town of Hudson

Libby Herland, USFWS

Arthur Vigeant, Mayor, City of Marlborough

Elfriede Parker, Acting President, General Federation of Women's Clubs of MA

Priscilla Geigis, MA Department of Conservation and Recreation

MA Senator Jamie Eldridge

MA Senator Michael Barrett

MA Representative Carmine Gentile

MA Representative Danielle Gregoire

MA Representative Kate Hogan

Matthew Beaton, Secretary MA EEOEA; Chair, MA Energy Facilities Siting Board

US Senator Elizabeth Warren

US Senator Edward Markey

US Congresswoman Nikki Tsongas

US Congresswoman Katherine Clark

Britney McNamara, Metrowest Daily News

John Laidler, Boston Globe

Protect Sudbury