



United States Department of the Interior



FISH AND WILDLIFE SERVICE

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

June 28, 2016

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

Dear Ms. Schultz:

The preferred route of Eversource's proposed Sudbury to Hudson Transmission Reliability Project runs adjacent to the southern boundary of the 2,333-acre Assabet River National Wildlife Refuge (NWR) in Sudbury and Hudson, MA. The Assabet River NWR is part of the National Wildlife Refuge System, and is administered by the U.S. Fish and Wildlife Service (FWS) out of the Eastern Massachusetts NWR Complex in Sudbury. The refuge is just to the north of the 900-acre Desert Natural Area, which is comprised of multiple conservation ownerships including the Sudbury Valley Trustees and the towns of Sudbury and Marlborough. These comments reflect the concerns of the FWS that the project as currently proposed would have not only on the Assabet River NWR, but also on adjacent conservation lands.

The FWS opposes the installation of an above ground, overhead 115-kilovolt transmission line within the existing Massachusetts Bay Transportation Authority (MBTA) railroad bed. We believe an underground installation would be less disruptive to wildlife habitat and to refuge visitors. We understand that there is a mandate and need to strengthen the regional electrical grid, but it cannot occur at the expense of the few remaining undeveloped open spaces with premier wildlife habitat in this part of Massachusetts. We recommend that Eversource more fully develop an alternative proposal that would route electrical transmission cables underground through local streets, as this configuration would eliminate disruption to natural resources. An alternative underground route along the abandoned MBTA railroad bed is also a possibility, but would still have adverse environmental impacts, and is therefore not our preferred option.

Our concerns mirror those of other organizations and municipalities you have heard from already. One of these concerns is the impact of an 82-foot wide transmission corridor on the Assabet River NWR and our neighboring conservation lands. Even though a corridor currently exists, the railroad tracks are overgrown with vegetation and the corridor is

narrow. An 82-foot wide corridor (or even a narrower corridor if the underground option along the railroad bed) would fragment wildlife habitat. Habitat fragmentation can make lands unsuitable for certain wildlife species by effectively reducing parcel size, which impacts species with large territorial needs. It increases edge habitat which can contribute to increased use by undesirable species such as brown-headed cowbirds, which have been documented to thrive in fragmented habitat and reduce native bird biodiversity. This is an important consideration since so many of the species which exist in this area are State-listed or special concern species, and the majority of the area is priority habitat designated by the Massachusetts Natural Heritage and Endangered Species Program.

The use of herbicides to manage vegetation within this right of way could impact vernal pools, wetlands and any wildlife species utilizing the vegetated areas under and around the powerlines. Even mowing the vegetation under and around the powerline would negatively impact wildlife nesting or feeding in the grasses and shrubby vegetation.

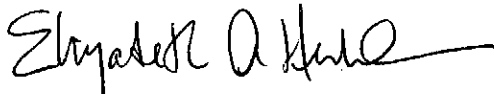
A wider corridor could become an attractive nuisance in that it would appeal to unauthorized all terrain vehicle (ATV) riders and motorized dirt bike riders. There are many places throughout the Commonwealth where this unauthorized use occurs under transmission lines. State and local municipalities do not have the resources to control illegal ATV use. We already have a problem with unauthorized ATV use on the Assabet River NWR and our partner conservation lands, and we dedicate considerable federal law enforcement resources to apprehend these illegal riders. Through effective enforcement, we have managed to minimize damage to wildlife and its habitat on the Assabet River NWR. Enforcement on municipal and private conservation lands is much harder, and none of us have the resources to sufficiently manage any increased illegal and undesirable use by motorized dirt bikes and ATVs.

Additionally, the presence of large overhead towers and transmission lines will adversely impact the outdoor experience of visitors to these conservation lands. The transmission line is an industrial use located within natural open space. It will be an eyesore at best and will reduce our ability to meet the mandated requirements of the National Wildlife Refuge System Improvement Act to provide quality wildlife observation and photography opportunities to the American public.

Lastly, we are concerned about the impact this transmission line will have on our ability to conduct prescribed burns on the Assabet River NWR and adjacent conservation lands. We are working together cooperatively with partners to manage this area as a pine-oak habitat, a habitat in the Commonwealth that supports many rare species and requires periodic burning to maintain its viability and biodiversity. We are working towards management where prescribed burning will be able to take place on multiple ownerships. A large overhead transmission line that bisects the conservation lands will impact the ability to burn effectively and efficiently, and could eliminate some areas from using fire altogether as a habitat management tool.

It is our hope and expectation that you will carefully consider these comments as you move from the conceptual stage to preparing the documents for submission to the Massachusetts Energy Facilities Siting Board. Please add my name to your mailing list so that we may be kept informed of future actions regarding this proposal.

Sincerely,



Elizabeth A. Herland
Wildlife Refuge Manager

cc:

U.S. Senator Elizabeth Warren
U.S. Senator Edward Markey
U.S. Congresswoman Niki Tsongas
U.S. Congresswoman Katherine Clark
Governor Charlie Baker
Matthew Beaton, Secretary MA EOEEA
George Peterson, Commissioner, Department of Fish & Game
Leo Roy, Commissioner, MA Department of Conservation and Recreation
Mark Boyle, MBTA
State Senator Jamie Eldridge
State Senator Michael Barrett
State Representative Carmine Gentile
State Representative Danielle Gregoire
State Representative Kate Hogan
Melissa Murphy Rodrigues, Sudbury Town Manager
Tom Moses, Executive Assistant, Town of Hudson
Arthur Vigeant, Mayor, City of Marlborough
Dave Manjarrez, President, Friends of Assabet River NWR
Lisa Vernegaard, Executive Director, Sudbury Valley Trustees
Elfriede Parker, Acting President, General Federation of Women's Clubs of
Massachusetts
Leslie G. Hamilton, Protect Sudbury
Jennifer Krowchun, O'Neill and Associates
Beverly O'Leary, Eversource
Mark Kimball, Eversource