

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

June 15, 2017

Re: Eversource Energy Petition
Sudbury-Hudson Transmission Reliability Project

Dear Mr. August:

The Town of Hudson Conservation Commission offers the following comments on the petition filed by Eversource Energy ("Eversource") regarding the Sudbury-Hudson Transmission Reliability Project (the "Project"). The Project proposes construction of approximately 9 miles of new 115-kV transmission line through Sudbury, Marlborough, Stow and Hudson.

The Commission believes that the preferred route described by Eversource, under the ground along a Right of Way ("ROW") through an inactive railroad corridor owned by the Massachusetts Bay Transportation Authority ("MBTA"), has significantly greater environmental impacts than stated in the Eversource Analysis. The rating of "3" for disruption of Conservation Land use is too low to account for the loss of important protected public land and for the negative impact on water and wetland resource areas, protected ecosystems and valuable wildlife habitat. The Commission strongly recommends careful consideration of the alternative route, under existing roads.

The proposed Project bisects one of the largest and most pristine natural resources remaining in the area, which includes parts of the Assabet River National Wildlife Refuge, the Desert Natural Area, the Marlborough-Sudbury State Forest in Hudson, as well as conservation lands in Sudbury. The Project's preferred route comes within 1500 feet of Lake Boon, a state-designated Great Pond, and bisects a tributary to Lake Boon. The Project comes within 1200 feet of White Pond, another state-designated Great Pond, and an alternative water supply for the Town of Maynard. The Project's route also bisects Fort Meadow Brook, a tributary to the Assabet River, and passes closely to at least fifteen certified vernal pools, as well as a number of potential vernal pools.

The preferred route would disturb soils contaminated with wood preservatives and with heavy metals and other contaminants deposited from years of train operations. In addition, the machinery and fuels involved in construction, and future disturbance and pollution caused by the use of the access road(s) once in place, pose a threat of environmental harm.

The Project's environmental impacts extend well beyond water and wetlands. The Project would result in the loss of over one million square feet of mature forestland, which would have a large impact on soils and wildlife, and would alter the local microclimate by changing the winds, temperatures, moisture

and light. Mature and healthy forests are comprised of a mix of tree growth. Clearing the ROW for 6.7 miles, at a width of 30' to 50', of all trees, young and old, would result in a loss of over 26 acres of trees. This is a significant clearing of trees, especially considering the bogs, vernal pools, streams and other wetlands adjacent to the ROW. The loss of habitat and the contribution to climate change, the impacts on water absorption and soil erosion, and the potential for invasive growth to take root in disturbed areas are critical concerns that cannot be fully mitigated.

The Eversource Analysis discusses protection of endangered species, which impacts a small percentage of the land to be cleared. However, as natural areas in the region are rapidly shrinking, remaining large areas of habitat such as the MBTA ROW are critical to protect wildlife regardless of their endangered status. In addition, in the near future NHESP will be publishing changes to the endangered species and protected habitats lists, which may impact the Project analysis.

The Project would alter approximately 320,000 square feet of jurisdictional wetland resource areas and permanently fill nearly 13,000 square feet of bordering vegetated wetlands, a significant environmental impact. Wetlands are protected resources which perform critical functions including flood control and pollution filtering, and are a valuable habitat for diverse wildlife. Wetland replication may be attempted, but it is extremely difficult and more frequently fails than succeeds. In addition, the construction of replication areas frequently results in the cutting of more trees and the loss of more upland forest.

Wetland resource areas were rated differently in the different towns, with areas protected by local bylaws getting points only in those towns. Although Hudson doesn't currently have a local wetlands protection bylaw, its natural resources are as valuable as those in other communities. The loss of potential vernal pools, buffer zones for vernal pools and intermittent streams, and other bylaw-protected resources should receive as much weight in Hudson as in neighboring towns.

The Commission feels that not enough attention and weight was paid to the proximity of the Project to the watersheds and aquifers surrounding the five Hudson town wells (the Chestnut, Cranberry and Kane wellhead areas), which provide water for over 20,000 people. The ROW transverses two Zone II protection areas and is close to several Zone 1 protection areas associated with those wellhead areas. Eversource must provide baseline information to establish the water quality in these wellhead areas and develop a plan to ensure that water quality remains at or above present levels. The rating of "3" for wellhead areas is insufficient.

If the preferred route were to be approved, the Commission feels strongly that the development and implementation of a comprehensive management plan would be required for the entire corridor, including a policy on pesticide application, invasive control, mowing, and other activities in perpetuity. The protective environmental measures required for construction, the mitigation required after construction, and the maintenance costs to manage the environmental impacts of ongoing use of the corridor would all add significant costs to the Project.

EFSB review must include careful consideration of the Project's alternatives. The environmental impacts have been understated for the Project's impacts along the MBTA ROW, and overstated for the alternative Project design for installation of the transmission lines entirely under existing roads. The Project's alternative route under existing roads must be better assessed, described, and compared to the Preferred Route along the ROW, to ensure that feasible alternatives with less environmental impacts are carefully considered and vetted during the EFSB process.

In conclusion, if the cost of the Project were calculated using a full cost accounting, including the costs of lost environmental services, the potential of increased flooding and pollution due to the loss of water absorption and filtering by wetlands and tree roots, contributions to climate change, and the other environmental impacts discussed above, it would be much higher than the current estimates indicate.

Thank you for your consideration of our concerns.

Town of Hudson Conservation Commission