



August 8, 2018

12970.00

Sudbury Conservation Commission
275 Old Lancaster Road
Sudbury, MA 01776

Re: MADEP File No. 301-1231
Subsurface Investigation Notice of Intent
Sudbury-Hudson Transmission Reliability Project

Dear Chairman Friedlander and Commission Members:

Nover-Armstrong issued a comment letter on July 31, 2018, that addressed the July 16, 2018 supplemental submission made by Eversource and VHB. The supplemental submission included a response to comments from both the Commission and Nover-Armstrong. The plans that accompany the NOI were not revised because the review of the ANRAD application, and therefore boundaries of wetland resource areas, was still ongoing. Since the supplemental submission, the Commission voted to issue two Orders of Resource Area Delineation (ORAD) and approved all wetland resource area boundaries. Accordingly, the NOI plans were revised with the approved boundaries per Nover-Armstrong's request and three full sets are included with this submission.

In addition, the impact numbers were recalculated based on the approved wetland resource area boundaries. The Project will result in 58 subsurface activities and 36 tree removals within the Commission's jurisdiction. Shrub and sapling removals will also occur throughout jurisdictional areas. Below is a table summarizing regulated activities per sheet (see Table 1) and a table summarizing regulated activities per resource area (see Table 2). Please note that in Table 2, impacts are broken out by resource area, so areas of vegetation removal and/or subsurface activities may appear in more than one resource area (e.g. B38 on sheet 16 is in RFA and the wetland buffer/AURA and all activities within the vernal pool buffers are within wetland buffers).



Table 1 Summary of activities within the Commission's jurisdiction

Sheet	Subsurface Activities	Tree Removals	Shrub/Sapling Removal	Sheet	Subsurface Activities	Tree Removals	Shrub/Sapling Removal
1	0	0	No	23	0	0	No
2	0	0	No	24	0	3	Yes
3	0	0	No	25	1	0	No
4	0	1	Yes	26	2	0	No
5	0	0	No	27	2	0	No
6	0	0	No	28	6	0	Yes
7	0	0	No	29	4	7	Yes
8	1	0	No	30	6	5	Yes
9	0	0	No	31	3	1	Yes
10	1	1	Yes	32	1	1	Yes
11	0	0	Yes	33	7	5	Yes
12	0	0	No	34	8	2	Yes
13	0	0	No	35	3	1	Yes
14	0	0	No	36	1	0	Yes
15	0	4	Yes	37	2	0	Yes
16	3	4	Yes	38	1	0	Yes
17	1	0	No	39	2	1	Yes
18	0	0	No	40	1	0	Yes
19	0	0	No	41	0	0	No
20	0	0	No	42	0	0	No
21	0	0	No	43	1	0	No
22	1	0	No	44	0	0	No

Notes:

1. Certain subsurface investigation activities are on two sheets due to the match lines. Where this occurs, it was accounted for on the first sheet it is on to avoid counting it twice
2. The test holes are located within existing paved roadways.



Table 2. Summary of activities within the Commission's jurisdiction by wetland resource area

Vernal Pool Buffer			
Sheet Number	Tree Removal	Shrub/Sapling Removal	Subsurface Activity
4	1	No	None
10	1	Yes	B34
15	4	Yes	None
16	3	Yes	None
28	0	Yes	None
36	0	Yes	B52
37	0	Yes	None
39	0	Yes	WW15
40	0	Yes	WW16
AURA/Wetland Buffer			
Sheet Number	Tree Removal	Shrub/Sapling Removal	Subsurface Activity
4	1	No	None
10	1	Yes	B34
15	4	Yes	None
16	4	Yes	B38, TH43, TH44
22	0	No	B42
24	3	Yes	None
25	0	No	MP28
26	0	No	MP29, SB48
27	0	No	SB34, MP30
28	0	No	TH47, TH48, TH49, MP32
29	7	Yes	WW8, GB5, MP33, SB49
30	5	Yes	MP34, SB42, TH50, TH51, TH52, TH53
31	1	Yes	WW9, WW10, SB40
32	1	Yes	MP35
33	5	Yes	SB41, BB5, BB6, MP36, WW11
34	2	Yes	WW12, WW13, GB17, GB18, GB19, GB20, GB21, SB51
35	1	Yes	SB51, B51, SB50
36	0	Yes	B52
37	0	Yes	SB37, SB38
38	0	Yes	MP38
39	1	Yes	WW14, WW15
40	0	Yes	WW16
43	0	No	B55

Table 2 continued

RFA

Sheet Number	Tree Removal	Shrub/Sapling Removal	Subsurface Activity
8	0	No	B32
16	3	Yes	B38
17	0	No	B39
26	0	No	MP29, SB48
27	0	No	SB34, MP30
28	0	Yes	MP31, TH47, TH48, TH49, MP32
29	7	Yes	WW8, GB5, MP33, SB49
30	5	Yes	MP34, SB42, TH50, TH51, TH52, TH53
31	1	Yes	WW9, WW10, SB40
32	1	Yes	MP35
33	5	Yes	SB41, BB5, BB6, MP36, WW11
34	2	Yes	WW12, WW13, GB17, GB18, GB19, GB20, GB21, SB51
35	1	Yes	SB51, B51, SB50
36	0	Yes	B52
37	0	Yes	SB37

BLSF

Sheet Number	Tree Removal	Shrub/Sapling Removal	Subsurface Activity
29	1	No	WW8

LUWW

Sheet Number	Tree Removal	Shrub/Sapling Removal	Subsurface Activity
33	0	None	SS1, SS2

It is our understanding that all other concerns were addressed with the July 16, 2018 supplemental submission. Should you have any questions concerning this supplemental submission or require additional information, please contact me at 617.607.2157 or kkinsella@vhb.com.

Sincerely,



Katie Kinsella

Senior Environmental Scientist

CC: Denise Bartone - Eversource Energy
Jill Provencal - MA DEP (Northern Regional Office)