

April 16, 2020

Sudbury Conservation Commission  
275 Old Lancaster Road  
Sudbury, MA 01776

Re: Joint NOI filed by Eversource for Sudbury-Hudson Transmission Reliability Project and MassDCR for Mass Central Rail Trail in Sudbury

Dear Sudbury Conservation Commission:

Sudbury Valley Trustees (SVT) submits these comments for your consideration in your review of the Joint Notice of Intent (NOI) filed by Eversource and the Massachusetts Dept. of Conservation and Recreation (DCR). SVT's mission to protect natural areas and wildlife habitat throughout a 36-town region west of Boston. This letter provides initial comments that were read to the commission at the hearing on April 13, 2020. SVT will prepare a second letter of additional comments and questions prior to the May 18<sup>th</sup> hearing.

Sudbury Valley Trustees (SVT) is an abutter to the project in Sudbury, owning 4,000 linear feet along the abandoned MBTA Railroad right-of-way (ROW), the proposed project location. This 220-acre SVT property is known as the General Federation of Women's Clubs Memorial Forest (commonly known as "Memorial Forest"). SVT has managed this land and abutting conservation lands owned by the Women's Federation for over 20 years.

SVT has been following and commenting upon the Eversource/DCR combined proposal to install a 115-kilovolt transmission line and bike trail on the ROW through several years of regulatory reviews and has submitted letters to regulatory authorities opposing the utility project location along the ROW. The proposed utility line installation and maintenance will severely impact a globally rare natural community, several listed rare species, a rich assemblage of wetland resource areas, and hundreds of acres of conservation lands that were protected with private, local, state and federal tax dollars, as well as the wild character of this natural area located only 25 miles from Boston.

SVT questions the filing of one NOI for two distinctly different projects that are owned and managed by two separate entities. The projects differ greatly in their purpose, the extent of their wetland and environmental impacts, and timelines. The Eversource project is much more impactful than the Rail Trail. It requires:

- extensive soil excavation and filling to depths and across areas that are far beyond the scope of the rail trail project
- far greater (22 - 60') tree clearing (compared to the rail trail which only requires paving a ten-foot trail, seeding and a rail fence where needed)
- splice vault and manhole excavations and maintenance (not needed for the rail trail)
- likely much greater impact to three historic bridges,
- far greater staging areas for heavy equipment and soils,
- a permanent access road, and very likely
- the movement and likely disposal of contaminated railbed soils and groundwater.

Thus, it would be entirely inappropriate to apply DEP's rail trail standards to the Eversource transmission line project, for example, the standards for soil management used in rail trail projects.

SVT believes that these significant differences warrant separate conditions and quite likely separate NOIs. Furthermore, there is significant uncertainty that the DCR work would commence within the three-year permit lifespan. We question the ability of Eversource and DCR to effectively coordinate compliance over the long-term.

SVT has questions and comments about that project as it is presented in the NOI.

1. We need to understand how the Eversource/DCR MOU will relate to the Order of Conditions. Will the MOU be drafted to include those Orders? What will be the content of the MOU? The MOU has tremendous bearing on the implementation of this project and requires review by the Conservation Commission and abutters.
2. If the project qualifies as a Limited Project, does this reduce the level of protection to our wetlands and wildlife resources?
3. What will happen to the one and only population of wild lupine that is located directly on the abandoned rail line at the junction of Hudson, Marlborough and Sudbury? While this is not a listed species, it is well-documented as declining in our region.

SVT is urging Hudson, Stow and Sudbury conservation commissions to consider the full scope of the project's environmental impacts along the entire approximately seven-mile length of the ROW and we encourage you to coordinate your review and conditioning. This project will have long lasting and wide-reaching impacts to wetlands resource areas along the entire route of the project.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa Vernegaard". The signature is fluid and cursive, with a large initial "L" and "V".

Lisa Vernegaard  
Executive Director