



FOR THE ASSABET SUDBURY & CONCORD RIVERS

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September 6, 2016

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Re: Comments on proposed Sudbury-Hudson Transmission Line Project

Dear Ms. Schultz,

Dick Lawrence
*Clerk
Hudson*

OARS would like to submit our concerns regarding the proposed Sudbury-Hudson Transmission Line which would run through and along several parcels of conservation land in Sudbury and Marlborough to Hudson. OARS has studied the coldwater fisheries resources present in these conservation areas in depth and continue to monitor their condition and we are concerned about the impact of the construction and maintenance of the proposed transmission line on these resources.

Don Burn
Westborough

Robert Donelan
Concord

Lisa Eggleston
Sudbury

Starting in 2012, OARS has assessed the ecological health of small trout streams in Sudbury, Marlborough and Hudson. These streams have some of the few remaining native Eastern brook trout (*Salvelinus fontinalis*) populations in eastern Massachusetts. Aside from being one of nature's most beautiful fish, the Eastern brook trout is a keystone species in the northeastern US. They inhabit flowing, highly oxygenated, coldwater streams and once occupied most of the coldwater streams in the eastern US. Today, geographically-isolated populations remain in only about 10% of the subwatersheds in eastern Massachusetts. The survival of these remaining populations is threatened by the pressures of human development including streamflow and temperature changes due to loss of natural vegetation, undersized road culverts, non-point source pollution, and climate change.

Allan Fierce
Stow

Paul Goldman
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OARS, Trout Unlimited, Sudbury Valley Trustees, the USGS Conte Fish Research Lab, and UMass Amherst collaborated to assess and protect brook trout habitat in the two Sudbury River tributaries known to have wild brook trout populations: Cranberry and Trout Brooks. This work included assessing current conditions and is part of a state-wide project to monitor climate change effects through longer-term stream and air temperature logging, which continues today.

Martin Moran
Hudson

Pam Rockwell
Concord

Peter Shanahan
Acton

The stream quality in both Trout and Cranberry Brooks was good to excellent within the protected areas of Memorial Forest, the Desert Natural Area, and adjoining protected areas. See attached map. The main factor that degraded the ratings in these protected areas was whether the stream was shaded, with the essential cooler temperatures found in the well-shaded areas.

Lisa Vernegaard
Maynard

The proposed transmission line would cross both Trout and Cranberry Brooks. Clearing and maintaining an 82-foot wide transmission line corridor will result in loss of shading by the existing trees and bushes, resulting in warmer water temperatures. During the summers our monitoring shows that the water temperatures approach the warmest allowable temperature before fish health is affected. Every effort needs to be taken to prevent further warming. Additional clearing would have a negative effect. The fish and their habitat would be exposed to herbicide should herbicide be used to maintain the open corridor. Lastly, the cleared corridor would encourage the use of ATVs and dirt bikes which are extremely damaging as they cross streams without regard to the erosion and siltation that they create; they are notoriously difficult to control.

Alternatives to this ecologically-damaging route must be considered. Putting the transmission line under already-existing streets would result in far less ecological damage. Some commenters have suggested burying the transmission lines beside the existing railroad bed. Unless great care can be taken to protect the streams during construction and suitable stream crossings designed, burying the transmission lines risks permanently damaging the natural courses and connectivity of the streams. The need to maintain a cleared corridor would still, presumably, necessitate the use of herbicides.

We appreciate the need to increase the reliability of the grid, particularly with climate disruptions that increase the likelihood of damaging wind and ice storms. However to damage one of the few remaining healthy wild trout habitats which has been protected through major public and private investment is not in the interest of either the Commonwealth or the local communities. We share the concerns detailed in letters to you by the owners of the conservation land that would be affected: US Fish and Wildlife Service, Marlborough Conservation Commission and Sudbury Valley Trustees.

Thank you for the opportunity to comment on the proposed transmission line project. We hope that you will take seriously the concerns we have raised and shift your attention to providing a viable alternative for your submission to the Massachusetts Energy Facilities Siting Board and local decision-makers. Please add us to your mailing list so that we may follow the development of this project.

Yours sincerely,

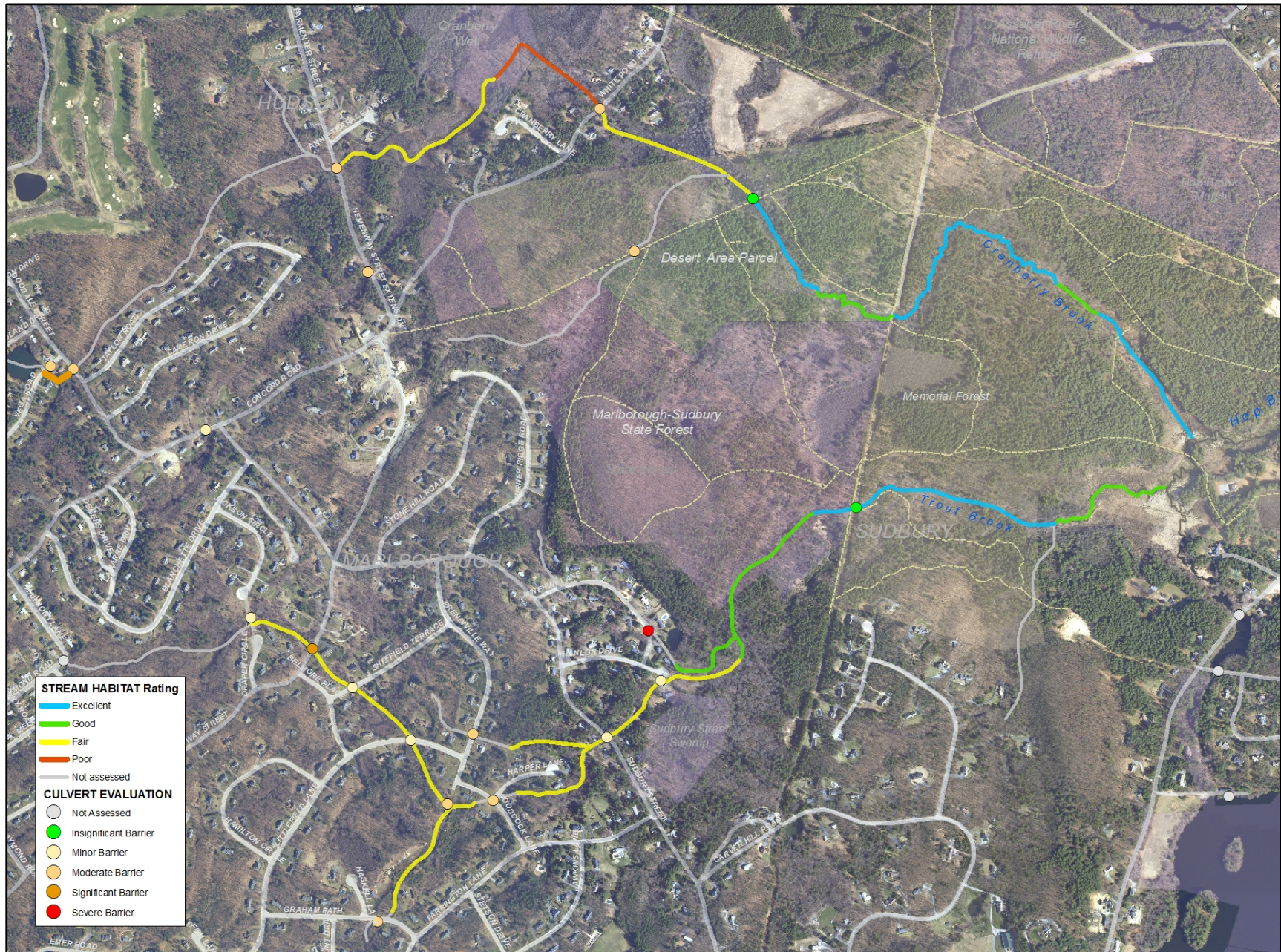
A handwritten signature in black ink, appearing to read 'A. Field-Juma', with a large, looping flourish extending from the end.

Alison Field-Juma
Executive Director

cc: US Congresswoman Niki Tsongas
US Congresswoman Katherine Clark
State Senator Jamie Eldridge
State Representative Carmine Gentile
State Representative Danielle Gregoire
State Representative Kate Hogan
Libby Herland, US Fish & Wildlife Service
Benjamin Letcher, USGS Conte Fish Research Laboratory
Matthew Beaton, Secretary EOEEA, and Chairman, Energy Facilities Siting Board
Angela M. O'Connor, Chairman, Department of Public Utilities

Leo Roy, Commissioner, Mass. Department of Conservation and Recreation
George Peterson, Commissioner, Mass. Dept. of Fish & Game
Martin Suuberg, Commissioner, Department of Environmental Protection
Mark C. Kalpin, Esq., Public Member, Environmental, EFSB
Melissa Murphy-Rodrigues, Town Manager, Town of Sudbury
Tom Moses, Executive Assistant, Town of Hudson
Arthur Vigeant, Mayor, City of Marlborough
Lisa Vernegaard, Sudbury Valley Trustees
Ray Philips, President, Protect Sudbury
Gary Crago, Greater Boston Trout Unlimited

Habitat and Culvert Evaluations - Cranberry & Trout Brooks



1:13,000 Base map data from Mass GIS (NAD 1983 MA State Plane). Hydrographic features data from USGS National Hydrography Dataset. S. Flint, OARS, Sept 2014