



# 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 14, 2017

Mr. Stephen August, Esq.  
Energy Facilities Siting Board  
One South Station  
Boston, MA 02110  
[dpu.efiling@state.ma.us/stephen.august@state.ma.us](mailto:dpu.efiling@state.ma.us/stephen.august@state.ma.us)

Re: EFSB17-02/DPU 17-82/17-83  
NSTAR Electric Company d/b/a Eversource Energy

Dear Mr. August:

The U.S. Fish & Wildlife Service (Service) appreciates the opportunity to provide comments on Eversource's proposed Sudbury to Hudson 115-kV electric transmission line. The proposed new transmission line abuts the Great Meadows National Wildlife Refuge (NWR) and the Assabet River NWR, both in the town of Sudbury, MA. These Service-owned properties are managed to conserve wildlife and provide the public with opportunities to engage in wildlife-dependent public use.

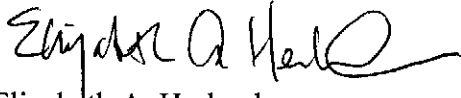
The Service is pleased that the proposal submitted by Eversource to the Energy Facilities Siting Board no longer considers an above-ground transmission line as its primary route. We do believe an underground route is preferable. We recommend that the Board approve the "Noticed Alternative Route" proposed by Eversource following the streets identified for the route as this alternative would eliminate impacts to the refuge. Although the "Primary Route" under the abandoned Massachusetts Bay Transportation Authority (MBTA) right of way would still result in environmental impacts, we would be supportive of that alternative provided the impacts are minimized. We do not support the "Noticed Variation" which calls for an above ground line along the MBTA right of way.

We will be providing comments separately to the Massachusetts Executive Office of Energy and Environmental Affairs about the primary route which is analyzed in an Environmental Notification Form as required by the Massachusetts Environmental Policy Act. While we understand that there will be many environmental certifications that Eversource will need to obtain in order to build the transmission line, we continue to have specific concerns about impacts to vegetation, wetlands and vernal pools on the Assabet

River NWR and adjacent conservation lands. We request that the Energy Facilities Siting Board consider the long-term ecosystem costs associated with disruption and alteration of these natural systems.

Thank you for your consideration of these comments

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth A. Herland". The signature is fluid and cursive, with a large, stylized initial "E" and a long, sweeping underline.

Elizabeth A. Herland  
Refuge Manager