



June 12, 2017

Ref: EEA # 15703

Ms. Page Czepiga  
MEPA Office  
Executive Office of Energy and Environmental Affairs  
100 Cambridge Street, Suite 900  
Boston, MA 02114

**Re: Sudbury-Hudson Transmission Reliability Project  
Submission of Corrected Environmental Notification Form  
(Corrections to the Environmental Notification Form and Wetland Impact Clarifications)**

Dear Ms. Czepiga,

On behalf of NSTAR d/b/a Eversource Energy, VHB is submitting this letter to MEPA to correct and clarify some of the information presented in its Environmental Notification Form (ENF) submitted on May 15, 2017 for the Sudbury-Hudson Transmission Reliability Project (the Project) (EEA # 15703). Attached to this letter is a corrected ENF dated June 9, 2017. While preparing for the site visit and scoping session scheduled for June 12, 2017, Eversource realized that anticipated wetland alterations from the Project as presented in the ENF either; (1) incorrectly included buffer zones, causing an overrepresentation of the actual proposed wetland alterations, and/or (2) were presented in a manner that warrants clarification as to the extent of anticipated alterations.

As a result of the corrections identified in this letter, the Project does not meet or exceed a mandatory Environmental Impact Report (EIR) threshold, as originally identified in the May 15, 2017 ENF. Although submission of an EIR is not mandatory for the Project, Eversource understands and appreciates that the local communities and other stakeholders have a vested interest in the potential environmental impacts of the Project and would like to continue to be open and transparent about those impacts. As such, Eversource is voluntarily seeking MEPA's review of the Project through the EIR process.

The following bullets provide an explanation for the necessary corrections and clarifications.

- Presentation of Overlapping Alteration Areas: In an effort to identify the level of alteration associated with various components of the Project (i.e., tree clearing and permanent land disturbance from limits of grading activities), wetland alteration totals presented in the tables on page 3 and page 16 present overlapping areas. Based upon comments we have received related to the ENF, this has caused confusion as to the actual alteration totals. For example, on page 3 of the ENF, the square feet of new bordering vegetated wetland alteration is presented as 13,794 square feet (tree clearing) and 12,962 square feet (permanent fill). In fact, the new alteration to

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bordering vegetated wetland from the Project is a total of 13,794 square feet (i.e., 13,794 square feet will be altered from tree clearing, of which 12,962 square feet will be permanently filled from anticipated grading activities and the remaining 832 square feet allowed to revegetate and continue to function as bordering vegetated wetland).

- **Local and State 100 Foot Buffer Zone Area included in alteration totals:** The square feet of new other wetland alteration presented in the ENF on page 3 was incorrectly listed as 756,436 square feet. This total included the locally jurisdictional 100-foot Buffer Zone to Bordering Land Subject to Flooding and the state/local jurisdictional 100-foot Buffer Zone to Bank and BVW. The category of other wetland alteration for MEPA purposes should only include alteration of wetland areas defined in the Massachusetts Wetlands Protection Act Regulations as Areas Subject to Protection at 310 CMR 10.02(1). The revised total for square footage of new "other wetland" alteration is 242,482 square feet (5.57 acres).

The specific corrections on the attached Corrected Environmental Notification Form (dated June 9, 2017) include the following:

- Page 2:
  - o **Does this project meet or exceed a mandatory EIR threshold?** Revise the response from "yes" to "no".
  - o **Which MEPA review threshold(s) does the project meet or exceed?** Correct the form to reflect that the Project does not alter one or more acres of bordering vegetated wetland. The correct MEPA review thresholds met or exceeded include:
    - 301 CMR 11.03 (1)(b)1. Direct alteration of 25 or more acres of land
    - 301 CMR 11.03 (3)(b)1.d. Alteration of 5,000 or more square feet of bordering vegetated wetlands
    - 301 CMR 11.03(3)(b)1.f. Alteration of ½ acre or more of any other wetlands
    - 301 CMR 11.03(7)(b)4. Construction of electric transmission lines with a capacity of 69 or more kV, provided that the transmission lines are one or more miles in length along, new, unused or abandoned right of way.
- Page 3:
  - o **New acres of land altered, Square feet of new bordering vegetated wetlands alteration, and Square feet of new other wetland alteration.** Note that these numbers include the footprint of both tree clearing and permanent fill impacts. The revised ENF form reflects the total impact only. In addition, the square feet of new "other wetland" alteration, that previously included local and state buffer zones, was revised to exclude buffer zones and to correctly present wetland areas only.
- Page 6:



- **Wetland Resources Impacts:**
  - Revised tree clearing amounts to square feet instead of acres
  - Provided clarification that the 12,962 square feet of proposed permanent fill to bordering vegetated wetlands is within the footprint of the 13,794 square feet of tree clearing proposed within bordering vegetated wetlands.
- Page 9:
  - **Is there an Outstanding Resource Water (ORW) on or within a half-mile radius of the project site?** Revised the response to “yes” and added detail that there are 15 Certified Vernal Pools (as mapped by NHESP) within a half-mile radius of the Project.
- Page 12:
  - **I.A. Does the project meet or exceed any review thresholds related to land?** Revised the response to “yes”, the Project involves alteration of 25 or more acres of land.
  - **II.A. Describe, in acres, the current and proposed character of the project site:** The acreage of proposed change has been added.
- Page 16:
  - **I.A. Will the project meet or exceed any review thresholds related to wetlands, waterways, and tidelands?** Corrected the response to identify that the Project involves alteration of more than 5,000 square feet of bordering vegetated wetland and alteration of ½ or more acre of any other wetlands.
  - **I.B. Describe any proposed permanent or temporary impacts to wetland resource areas located on the project site.** Removed the summary table and inserted total alteration numbers into Section C.
- Page 17:
  - **I.C. Estimate the extent and type of impact that the project will have on wetland resources, and indicate whether the impacts are temporary or permanent.** Added alteration numbers for Inland Wetlands to replace previous table on page 16.
  - **I.D.7. Is any part of the project located in buffer zones?** Added alteration totals.
  - **II.E.2. Will the project alter any federally-protected wetlands not regulated under state law?** Revised the response from “yes” to “no” as the 100-foot Upland Stream Buffer is not a federal wetland area.

Attached is a corrected ENF form (dated June 9, 2017) for your use in reviewing the Project. We apologize for any inconvenience these clarification/corrections may have caused; however, we believe it is

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imperative that your office, other regulatory agencies, stakeholders, and the public have the correct information related to this important regional energy project so they can make informed comments to MEPA about the Project. In addition, we are committed to making sure that all future information we submit to your office is clear and precise. If there is anything else that we can do to provide further clarification, please let us know.

Sincerely,

A handwritten signature in black ink that reads "Marc A. Bergeron".

Marc A. Bergeron

Sr. Project Manager/Wetland Scientist

Cc:

ENF Distribution List

**Commonwealth of Massachusetts**  
**Executive Office of Energy and Environmental Affairs**  
**Massachusetts Environmental Policy Act (MEPA) Office**

**Environmental Notification Form – CORRECTED JUNE 9, 2017**

<i>For Office Use Only</i>
EEA#: _____
MEPA Analyst: _____

*The information requested on this form must be completed in order to submit a document electronically for review under the Massachusetts Environmental Policy Act, 301 CMR 11.00.*

<b>Project Name:</b> Sudbury-Hudson Transmission Reliability Project		
<b>Street Address:</b> Inactive MBTA ROW in Sudbury, Marlborough, Stow, and Hudson; and Wilkins St and Forest Ave in Hudson		
<b>Municipality:</b> Sudbury, Marlborough, Stow, Hudson	<b>Watershed:</b> Sudbury River, Concord River	
<b>Universal Transverse Mercator Coordinates:</b> <u>Sudbury Substation:</u> Easting: 302601.86 / Northing: 4692530.57 <u>Hudson Substation:</u> Easting: 289559.80 / Northing: 4695942.23	<b>Latitude/Longitude:</b> <u>Sudbury Substation:</u> 42.359997; -71.397021 <u>Hudson Substation:</u> 42.387273, -71.556489	
<b>Estimated commencement date:</b> 2019		<b>Estimated completion date:</b> 2021
<b>Project Type:</b> Utility - Transmission Line	<b>Status of project design:</b> 25 %complete	
<b>Proponent:</b> NSTAR Electric Company d/b/a Eversource Energy		
<b>Street Address:</b> 247 Station Drive		
<b>Municipality:</b> Westwood	<b>State:</b> MA	<b>Zip Code:</b> 02090
<b>Name of Contact Person:</b> Vivian Kimball		
<b>Firm/Agency:</b> VHB	<b>Street Address:</b> 101 Walnut Street	
<b>Municipality:</b> Watertown	<b>State:</b> MA	<b>Zip Code:</b> 02471
<b>Phone:</b> 508-513-2713	<b>Fax:</b>	<b>E-mail:</b> vkimball@vhb.com

Does this project meet or exceed a mandatory EIR threshold (see 301 CMR 11.03)?

Yes  No

If this is an Expanded Environmental Notification Form (ENF) (see 301 CMR 11.05(7)) or a Notice of Project Change (NPC), are you requesting:

a Single EIR? (see 301 CMR 11.06(8))  Yes  No

a Special Review Procedure? (see 301CMR 11.09)  Yes  No

a Waiver of mandatory EIR? (see 301 CMR 11.11)  Yes  No

a Phase I Waiver? (see 301 CMR 11.11)  Yes  No

**(Note: Greenhouse Gas Emissions analysis must be included in the Expanded ENF.)**

Applicant requests GHG Policy *de minimus* exemption for this Project, which will result in no long-term emissions and minimal construction-related emissions.

**Which MEPA review threshold(s) does the project meet or exceed (see 301 CMR 11.03)?**

- 301 CMR 11.03(1)(b)1. Direct alteration of 25 or more acres of land, unless the Project is consistent with an approved conservation farm plan or forest cutting plan or other similar generally accepted agricultural or forestry practices.
- 301 CMR 11.03(3)(b)1.d. alteration of 5,000 or more sf of bordering or isolated vegetated wetlands (provided that a permit is required)
- 301 CMR 11.03(b)1.f. alteration of ½ or more acres of any other wetlands
- 301 CMR 11.03(7)(b)4. Construction of electric transmission lines with a Capacity of 69 or more kv, provided that the transmission lines are one or more miles in length along New, unused or abandoned right of way.

**Which State Agency Permits will the project require?**

EFSB/DPU:

- Approval to construct, G.L. c. 164, § 69J and 72
- Request for zoning exemptions, G.L. c. 40A, §3

MassDEP:

- 401 Water Quality Certification

MHC:

- Project Notification Form

MassDOT:

- State Highway Access Permit

NHESP:

- Conservation and Management Permit (*to be determined*)

**Identify any financial assistance or land transfer from an Agency of the Commonwealth, including the Agency name and the amount of funding or land area in acres:**

None

Summary of Project Size & Environmental Impacts	Existing	Change	Total
<b>LAND</b>			
Total site acreage	87.3 <sup>1</sup>		
New acres of land altered		26.7	
Acres of impervious area	Existing roadway	0	—
Square feet of new bordering vegetated wetlands alteration		13,794	
Square feet of new other wetland alteration		242,482	
Acres of new non-water dependent use of tidelands or waterways		—	
<b>STRUCTURES</b>			
Gross square footage	—	—	—
Number of housing units	—	—	—
Maximum height (feet)	—	—	—
<b>TRANSPORTATION</b>			
Vehicle trips per day	—	—	—
Parking spaces	—	—	—
<b>WASTEWATER</b>			
Water Use (Gallons per day)	—	—	—
Water withdrawal (GPD)	—	—	—
Wastewater generation/treatment (GPD)	—	—	—
Length of water mains (miles)	—	—	—
Length of sewer mains (miles)	—	—	—
<p>Has this project been filed with MEPA before?  <input type="checkbox"/> Yes (EEA # _____) <input checked="" type="checkbox"/> No</p>			
<p>Has any project on this site been filed with MEPA before?  <input checked="" type="checkbox"/> Yes (EEA # <u>15123</u>) <input type="checkbox"/> No</p>			

<sup>1</sup> Includes 7.8 acres of existing public roadways and 79.5 acres within existing inactive MBTA right-of-way.

## **GENERAL PROJECT INFORMATION – all proponents must fill out this section**

### **PROJECT DESCRIPTION**

*NOTE: The project description should summarize both the project's direct and indirect impacts (including construction period impacts) in terms of their magnitude, geographic extent, duration and frequency, and reversibility, as applicable. It should also discuss the infrastructure requirements of the project and the capacity of the municipal and/or regional infrastructure to sustain these requirements into the future.*

#### ***Describe the existing conditions and land uses on the project site:***

NSTAR Electric Company d/b/a Eversource Energy ("Eversource" or the "Company") proposes to construct, operate, and maintain an approximately 9-mile, 115-kilovolt ("kV") underground transmission line extending from Eversource's Sudbury Substation on Boston Post Road (Route 20) in Sudbury ("Sudbury Substation") to Hudson Light & Power Department's ("HLPD") substation at Forest Avenue in Hudson ("Hudson Substation") (the "New Line"). In order to accommodate the New Line, the Company and HLPD each will undertake modifications to their respective substations.<sup>2</sup> The New Line and related improvements at Sudbury Substation comprise the Sudbury-Hudson Transmission Reliability Project (the "Project").

Construction of the Project will serve the public interest by increasing the reliability of the regional electric transmission system. In addition, the Project provides the opportunity to couple construction of the New Line with the development of a portion of the planned regional Mass Central Rail Trail ("MCRT"), a multi-use trail that will be managed by the Massachusetts Department of Conservation and Recreation. The proposed MCRT, traversing the state from west to east, will bring a number of advantages to its users, surrounding communities, and the Commonwealth as a whole.

The Project will be installed primarily along an inactive railroad right-of-way ("ROW") owned by the Massachusetts Bay Transportation Authority ("MBTA"). The Project originates at the Sudbury Substation and travels northwest along the MBTA ROW passing through short sections of Marlborough and Stow before entering Hudson, where it travels underground within public roadways for 1.3 miles after exiting the MBTA ROW, terminating at the Hudson Substation. The Company's proposed route for the New Line and the location of the Sudbury and Hudson Substations are shown on a United States Geological Survey "USGS" quadrangle base map (see Figure 1-1, Locus Map). The New Line will pass mostly through the Towns of Sudbury and Hudson and will cross short sections of the Town of Stow and the City of Marlborough.

The width of the existing MBTA ROW varies in some locations, but is approximately 80 feet wide. The ROW is the former Massachusetts Central Railroad corridor used for passenger and/or freight service from approximately 1880 to 1970. The MBTA ROW has not been used for rail service for over forty years and currently contains remnants of the single track railroad (ballast, tracks, and ties) in some portions. Vegetation within the MBTA ROW has not been maintained since rail service was discontinued and consists mainly of shrubby growth and forested areas. Along the MBTA ROW, the route traverses through a mix of developed and undeveloped areas. The largest of the undeveloped areas is associated with protected open space areas that include lands held and/or managed by the Town of Sudbury, the City of Marlborough, the Sudbury Valley Trustees ("SVT"), and the U.S. Fish and Wildlife Service ("USFWS"). In some portions of the ROW, there are existing pathways and/or trails currently used by local residents for passive recreation. Evidence of off-road-vehicle use is evident in some locations as well.

In Sudbury, the Project crosses Hop Brook and Dudley Brook and is adjacent to mixed land uses including the Great Meadows National Wildlife Refuge, The Coolidge at Sudbury residential community, and commercial properties along Boston Post Road/Route 20. Past Union Avenue, land uses become primarily residential, and transition to conservation areas including Hopbrook Marsh Conservation Land, Memorial Forest, and Assabet River National Wildlife Refuge near the town boundary with Marlborough. The Project crosses through a small corner of Marlborough adjacent to the Desert Conservation Area before entering Hudson, where it passes the Marlborough-Sudbury State Forest and Charter Oak Golf Course. West of the golf course, land use becomes

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<sup>2</sup> HLPD is not a co-applicant with Eversource in this ENF. The Company will not construct, own, operate or maintain any transmission facilities at Hudson Substation. The information provided regarding the Hudson Substation is for informational purposes only.



primarily commercial/industrial. The Project crosses Fort Meadow Brook then enters a small corner of Stow near Ferjulian's Farm before re-entering Hudson, where it travels adjacent to residential neighborhoods to reach the intersection with Wilkins Street near a parking lot for the Assabet River Rail Trail. The Project then leaves the ROW and travels within Wilkins Street and Forest Avenue, passing residential neighborhoods and the Forest Avenue Elementary School, to reach the Hudson Substation.

***Describe the proposed project and its programmatic and physical elements:***

The Project consists of an underground transmission line and access road from the Sudbury Substation along the MBTA ROW to the Hudson Substation, and associated upgrades at the Sudbury Substation and Hudson Substation to accommodate the New Line. The access road will facilitate development of a multi-use path that DCR has planned within the ROW. The duct bank will contain a total of eight conduits enclosed in a common thermal concrete envelope that is four feet wide and five and a half to eight feet deep, depending on the design profile of the duct bank.

***1. Transmission Line and Access Road***

Construction of the New Line will require a 30-foot-wide corridor along the MBTA ROW to be cleared of trees and woody shrubs to facilitate the installation of the duct bank/splice vault system and the access road. Within the 30 feet of clearing, a 22-foot-wide construction platform will be developed that consists of:

- a 14-foot-wide access road
- a 4-foot-wide duct bank (offset from the access road by 1 foot)
- splice vaults (requiring additional workspace outlined below)
- 3 feet of additional construction area to facilitate installation of the duct bank

At each proposed splice vault location, the limits of clearing will be temporarily expanded to an approximate width of 40 feet, for a length of 50 feet, to accommodate temporary work pads for the installation of the vault. Following construction, these areas will be allowed to grow back to the final maintained ROW width of 30 feet. For this Project, it is anticipated that each splice vault will be approximately 10 feet wide by 8 feet high and 30 feet long (inside dimensions). Due to their size, most of the splice vaults will be located partially underneath the access road with the manhole covers adjacent to the road and in the shoulder. The splice vault depth will vary by location, with the base measuring approximately 12 to 15 feet below the proposed final grade of the access road. Splice vaults will be spaced approximately every 1,500 to 1,800 feet. At each splice vault, a precast communication handhole measuring 4 feet by 4 feet by 4 feet will be installed parallel to each splice vault.

The conversion of the existing rail bed to an access road requires the removal and salvage of the steel rails and disposal of the wooden rail ties prior to grading and leveling. At this time, no excess soil is anticipated to be generated from construction activities; however, if there is any excess soil, it will be removed from the construction area and transported to a temporary construction laydown area for characterization prior to disposal.

It is assumed that the duct bank can be installed above all existing culverts along the ROW. There are three existing bridges over waterbodies along the ROW. Based on a preliminary engineering review, the Company plans to reuse the existing bridge structures and rehabilitate them to accommodate a utility crossing. The bridge improvements will also incorporate the future multi-use path in accordance with DCR's proposed design plans.

Following construction, Eversource will maintain a 30-foot-wide corridor; 22 feet of this width will be maintained cleared of trees and woody shrubs and includes the access road, duct bank, and shoulder adjacent to the duct bank. In the remaining shoulder adjacent to the other side of the access road, some plantings with limited woody vegetation may be allowed to grow up to a height of 15 feet.

***2. Sudbury Substation***

All improvements to the Sudbury Substation will be installed within the existing fence line of the substation, and include the installation of the following equipment, as well as a duct bank to route the New Line from the substation to the MBTA ROW.

- 115-kV breaker with associated disconnect switch
- 115-kV surge arresters (three)
- 115-kV cable disconnect switch (one) and termination structure(s) (three)

- 115-kV air core shunt reactor with associated foundations
- 115-kV breaker with associated disconnects and foundations to switch the shunt reactor
- Shielding mast (approximately 100 feet tall)
- 115-kV bus support structure (one) for 115-kV conductors
- Control, protection, and communication equipment inside the existing control house
- Underground conduits and cable trench for control cables

### 3. Hudson Substation

HLPD will be responsible for constructing, owning, and operating any transmission facilities at the Hudson Substation that will be necessary to support the new transmission line. It is the Company's understanding that improvements to the Hudson Substation will require an expansion of the existing substation footprint, and will include installation of the following equipment:

- Three (3) new 115-kV circuit breakers and associated disconnect switches
- 115-kV cable termination structures
- Protective relaying
- Control house
- Modification of existing bus work
- Security infrastructure
- Two (2) transmission towers to re-terminate existing H-160 & N-166 transmission lines with concrete foundations
- SCADA system and remote communications

***Describe the on-site project alternatives (and alternative off-site locations, if applicable), considered by the proponent, including at least one feasible alternative that is allowed under current zoning, and the reasons(s) that they were not selected as the preferred alternative:***

*NOTE: The purpose of the alternatives analysis is to consider what effect changing the parameters and/or siting of a project, or components thereof, will have on the environment, keeping in mind that the objective of the MEPA review process is to avoid or minimize damage to the environment to the greatest extent feasible. Examples of alternative projects include alternative site locations, alternative site uses, and alternative site configurations.*

The Company reviewed a variety of existing linear corridors including transmission line, highway, railroad, and pipeline ROWs; however, other existing ROWs were found to be impractical alternatives because they were either overly circuitous in connecting the Sudbury Substation and Hudson Substation or of insufficient width to construct a new transmission line. No feasible alternative was identified that would be allowed under current zoning.

Eversource also considered several routing options along different roadways between the two substations, as well as construction of an overhead transmission line within the MBTA ROW. The overhead transmission line would require tree clearing along the full width of the ROW and result in significantly greater environmental impacts. Other roadway options, including routes located entirely in roadways, would result in greater impacts to the natural and/or developed environments than the proposed route. Through a detailed evaluation of the potential environmental impacts and cost of each route, the Company determined that the proposed underground route will minimize environmental impacts while keeping the cost of the project as low as possible.

***Summarize the mitigation measures proposed to offset the impacts of the preferred alternative:***

#### 1. Wetland Resources

##### a) *Impacts*

Construction of the Project within the MBTA ROW will result in impacts to wetland resources as a result of tree clearing and creation of the construction platform. As described previously, the ROW will need to be cleared to a width of 30 feet along the entire length, with temporary 40-foot-by-50-foot areas in splice vault locations, resulting in 13,794 square feet of tree clearing within wetlands. These expanded areas will be allowed to grow

back to maintain a 30-foot width after construction is completed. The 22-foot construction platform needed to install the access road and transmission line will result in 12,962 square feet of permanent fill within the footprint of proposed tree clearing.

Although there are BVWs and Buffer Zones along the public roadway portion of the Project, no impacts will be anticipated from construction of the Project within the existing pavement, and proper implementation of BMPs will protect these resources during construction.

No temporary impacts to wetland are anticipated from construction of the Project.

#### *b) Mitigation*

Impacts from the construction of the Project will be minimized by designing the placement of the access road and duct bank outside of these resources whenever possible. During construction, wetland resources will be protected by the installation of appropriate erosion and sedimentation BMPs.

For any unavoidable impacts, the Company will work with the United States Army Corps of Engineers (“USACE”), MassDEP, Massachusetts Natural Heritage and Endangered Species Program (“NHESP”), and local Conservation Commissions to develop the necessary compensatory mitigation plans and could include, but not be limited to the following:

- USACE New England District Compensatory Mitigation Guidance (2016) recommends that proposed mitigation provide compensation at a ratio of at least 2:1 and up to 15:1 depending on the type of resource areas impacted and the mitigation approach proposed (restoration, creation, rehabilitation, and/or preservation).
- Massachusetts Wetlands Protection Act (“MWPA”) Regulations prescribe certain performance standards for impacts within different resource areas, including creation of BVW at a 1:1 ratio to mitigate for any permanent fill and for the creation of compensatory flood storage for any permanent fill within BLSF.
- Local bylaws: Stow and Sudbury both have local wetlands protection bylaws that prescribe certain performance standards for impacts within different resource areas and that may require additional mitigation beyond what is prescribed in the MWPA regulations.

Final details regarding the overall wetland-related mitigation approach will be determined when final design is complete. Mitigation plans will be included in the various permit applications to be submitted to local, state, and federal regulatory agencies for review, and the permits issued will contain conditions specifying the mitigation required.

## 2. Rare Species

#### *a) Impacts*

There are two areas mapped as protected habitats for state-listed rare species along the route for the Project. Based upon the response to an information request from NHESP, one of the areas contains a state-listed amphibian species while the other contains two state-listed reptiles and one state-listed bird species. Habitat impacts include habitat conversion due to tree clearing (a total of approximately 5.0 acres); and permanent habitat loss associated with access road construction (approximately 2.3 acres). Note that these impact areas overlap, resulting in disturbance to approximately 5.0 *total* acres of mapped habitat along the Project.

#### *b) Mitigation*

The Company will work with NHESP staff through the MESA permit process, which may require appropriate Protection Plans for each state-listed rare species. These Protection Plans will focus on minimizing direct mortality of state-listed species that may be present within the MBTA ROW during construction. Impact minimization measures could include time of year restrictions for construction, use of temporary exclusionary barriers, and wildlife clearing surveys conducted daily by qualified biologists prior to the start of work. If NHESP staff determines that construction along the MBTA ROW will result in a “take,” then a Conservation and Management Permit (CMP) will be obtained by the Company. Typical mitigation options under a CMP may include offsite habitat protection or funding of programs that directly benefit the affected species. Offsite habitat protection typically requires the acquisition of land, under fee ownership or conservation restriction, for permanent habitat conservation. Other mitigation options consist of financial contribution toward land

acquisition, conservation research funding, habitat management, or other programs that directly benefit the affected species.

### 3. Cultural Resources

#### a) *Impacts*

Construction of the Project will occur mainly within an established MBTA ROW and is not anticipated to result in impacts to known archaeological sites due to the previously disturbed nature of the ROW. Above-ground historic properties could be affected by a change to the existing view shed due to the clearing of the 30-foot corridor along the ROW. Construction within the roadway portions of the route is not anticipated to result in any impacts to cultural resources.

#### b) *Mitigation*

The Project will be subject to review under Section 106 of the National Historic Preservation Act (36 C.F.R 800, "Section 106") and will require a permit from the USACE. The Project will also be subject to review by the Massachusetts Historical Commission ("MHC") under G.L. c. 9 §§ 26–27C. The Company will coordinate with the USACE and MHC to avoid and/or minimize adverse effects to any eligible historic resource and to archaeological resources. As part of the USACE's Section 404 permit review, and pursuant to Section 106, the federal agency will also consult with Native American Tribes that express an interest in the cultural resources that may be affected by those portions of the routes subject to USACE and MHC jurisdiction. The Company will coordinate with Commonwealth Heritage Group, Inc., to further evaluate potential impacts to archaeological resources prior to construction and to identify areas that should be avoided or which, if not able to be avoided, would necessitate measures to protect the cultural resource. Procedures to handle unanticipated discoveries during construction will be specified as part of a Construction Management Plan.

#### Stormwater

The Project will be designed to comply with the MADEP Stormwater Management Policy (2008). Additionally, the Project will be covered by a USEPA NPDES Construction General Permit, and an accompanying Storm Water Pollution Prevention Plan will be prepared prior to the start of construction. The SWPPP will include a construction personnel contact list and a description of the proposed work, and identify stormwater controls, spill prevention measures, and inspection practices to be implemented for the management of construction-related stormwater discharges from the Project. Best Management Practices will be employed to minimize erosion and other potential environmental impacts, and an environmental monitor will be on the Project site on a regular basis to ensure compliance with the SWPPP and other applicable permit requirements.

#### ***If the project is proposed to be constructed in phases, please describe each phase:***

The Project will not be phased.

**AREAS OF CRITICAL ENVIRONMENTAL CONCERN:**

Is the project within or adjacent to an Area of Critical Environmental Concern?

Yes (Specify \_\_\_\_\_)  No

if yes, does the ACEC have an approved Resource Management Plan?  Yes  No;

If yes, describe how the project complies with this plan. \_\_\_\_\_

Will there be stormwater runoff or discharge to the designated ACEC?  Yes  No;

If yes, describe and assess the potential impacts of such stormwater runoff/discharge to the designated ACEC. \_\_\_\_\_

**RARE SPECIES:**

Does the project site include Estimated and/or Priority Habitat of State-Listed Rare Species? (see

[http://www.mass.gov/dfwele/dfw/nhosp/regulatory\\_review/priority\\_habitat/priority\\_habitat\\_home.htm](http://www.mass.gov/dfwele/dfw/nhosp/regulatory_review/priority_habitat/priority_habitat_home.htm))  Yes (Specify: PH 687/EH 648, PH1516/EH 38)  No

**HISTORICAL/ARCHAEOLOGICAL RESOURCES:**

Does the project site include any structure, site or district listed in the State Register of Historic Place or the inventory of Historic and Archaeological Assets of the Commonwealth?

Yes (Specify SUD.P, SUD.282, SUD.B, SUD-HA-26, HUD.908, SUD.900, SUD.901 )  No

If yes, does the project involve any demolition or destruction of any listed or inventoried historic or archaeological resources?  Yes (Specify \_\_\_\_\_)  No

**WATER RESOURCES:**

Is there an Outstanding Resource Water (ORW) on or within a half-mile radius of the project site?

Yes  No; if yes, identify the ORW and its location.

*(NOTE: Outstanding Resource Waters include Class A public water supplies, their tributaries, and bordering wetlands; active and inactive reservoirs approved by MassDEP; certain waters within Areas of Critical Environmental Concern, and certified vernal pools. Outstanding resource waters are listed in the Surface Water Quality Standards, 314 CMR 4.00.)*

There are 15 certified vernal pools within a half-mile radius of the Project.

Are there any impaired water bodies on or within a half-mile radius of the project site?  Yes  No; if yes, identify the water body and pollutant(s) causing the impairment: \_\_\_\_\_.

Is the project within a medium or high stress basin, as established by the Massachusetts Water Resources Commission?  Yes  No

The Project is located within portions of the Assabet and Sudbury River basins, portions of which have been mapped as Medium Stress Basins. The Project will have no effect on this designation.

**STORMWATER MANAGEMENT:**

Generally describe the project's stormwater impacts and measures that the project will take to comply with the standards found in MassDEP's Stormwater Management Regulations:

The Project will be constructed in compliance with the Massachusetts Wetlands Protection Act and the MassDEP Stormwater Regulations. The majority of the stormwater management standards are not

applicable to the proposed work. The primary applicable standard is Standard #8: Construction Period Pollution Prevention and Erosion and Sedimentation Controls. The Company will install erosion control devices and employ dewatering as needed. Daily inspections of all work areas and erosion controls will be conducted by construction crews and weekly inspections will be performed by an experienced environmental monitor.

**MASSACHUSETTS CONTINGENCY PLAN:**

Has the project site been, or is it currently being, regulated under M.G.L.c.21E or the Massachusetts Contingency Plan?  Yes  No; if yes, please describe the current status of the site (including Release Tracking Number (RTN), cleanup phase, and Response Action Outcome classification):

RTN	Current Status	RAO Class
3-2640	RAO	C1
3-24573	RAO	A1

Is there an Activity and Use Limitation (AUL) on any portion of the project site?  Yes  No; if yes, describe which portion of the site and how the project will be consistent with the AUL:  
 Are you aware of any Reportable Conditions at the property that have not yet been assigned an RTN?  Yes  No; if yes, please describe: \_\_\_\_\_

**SOLID AND HAZARDOUS WASTE:**

If the project will generate solid waste during demolition or construction, describe alternatives considered for re-use, recycling, and disposal of, e.g., asphalt, brick, concrete, gypsum, metal, wood:

The Project may generate solid waste including railroad tracks and ties, pavement, and minor amounts of construction debris such as wood pallets and wooden spools. The Company will recycle all such material as required by regulation.

***NOTE: Asphalt pavement, brick, concrete and metal are banned from disposal at Massachusetts landfills and waste combustion facilities and wood is banned from disposal at Massachusetts landfills. See 310 CMR 19.017 for the complete list of banned materials.)***

Will your project disturb asbestos containing materials?  Yes  No; if yes, please consult state asbestos requirements at <http://mass.gov/MassDEP/air/asbhom01.htm>

**Describe anti-idling and other measures to limit emissions from construction equipment:**

Construction contractors will be required to adhere to all applicable regulations regarding control of construction vehicle emissions. Construction specifications will require that all diesel construction equipment used on-site would be fitted with after-engine emissions controls, and contractors will be required to utilize ultra-low sulfur diesel fuel and minimize idling time.

**DESIGNATED WILD AND SCENIC RIVER:**

Is this project site located wholly or partially within a defined river corridor of a federally designated Wild and Scenic River or a state designated Scenic River?  Yes  No;

if yes, specify name of river and designation:

If yes, does the project have the potential to impact any of the “outstandingly remarkable” resources of a federally Wild and Scenic River or the stated purpose of a state designated Scenic River?

Yes  No; if yes, specify name of river and designation: \_\_\_\_\_;

if yes, will the project will result in any impacts to any of the designated “outstandingly remarkable” resources of the Wild and Scenic River or the stated purposes of a Scenic River.  Yes  No;



if yes, describe the potential impacts to one or more of the “outstandingly remarkable” resources or stated purposes and mitigation measures proposed.

## **ATTACHMENTS:**

1. **List of all attachments to this document.**

See below.

2. **U.S.G.S. map (good quality color copy, 8-½ x 11 inches or larger, at a scale of 1:24,000) indicating the project location and boundaries.**

Provided as Attachment A.

3. **Plan, at an appropriate scale, of existing conditions on the project site and its immediate environs, showing all known structures, roadways and parking lots, railroad rights-of-way, wetlands and water bodies, wooded areas, farmland, steep slopes, public open spaces, and major utilities.**

Provided as Attachment B.

4. **Plan, at an appropriate scale, depicting environmental constraints on or adjacent to the project site such as Priority and/or Estimated Habitat of state-listed rare species, Areas of Critical Environmental Concern, Chapter 91 jurisdictional areas, Article 97 lands, wetland resource area delineations, water supply protection areas, and historic resources and/or districts.**

Provided as Attachment C.

5. **Plan, at an appropriate scale, of proposed conditions upon completion of project (if construction of the project is proposed to be phased, there should be a site plan showing conditions upon the completion of each phase).**

Provided as Attachment D.

6. **List of all agencies and persons to whom the proponent circulated the ENF, in accordance with 301 CMR 11.16(2).**

Provided as Attachment E.

7. **List of municipal and federal permits and reviews required by the project, as applicable.**

### **Municipal**

- *Conservation Commissions (Hudson, Stow, Sudbury):*
  - Massachusetts Wetlands Protection Act (310 CMR 10.00)
  - Wetland non-zoning bylaw filings (Notice of Intent)
- *Boards of Selectmen (Hudson, Sudbury):*
  - Grants of Location
  - Street Opening Permits

### **Federal**

- *US Army Corps of Engineers:*
  - Section 404 Federal Clean Water Act – Pre-Construction Notification
- *US Environmental Protection Agency:*
  - National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges from Construction Activities

**LAND SECTION – all proponents must fill out this section**

**I. Thresholds / Permits**

- A. Does the project meet or exceed any review thresholds related to land (see 301 CMR 11.03(1))**  
 Yes  No; if yes, specify each threshold:

301 CMR 11.03(1)(b)1. Direct alteration of 25 or more acres of land, unless the Project is consistent with an approved conservation farm plan or forest cutting plan or other similar generally accepted agricultural or forestry practices.

**II. Impacts and Permits**

- A. Describe, in acres, the current and proposed character of the project site, as follows:**

	<u>Existing</u>	<u>Change</u>	<u>Total</u>
Footprint of buildings	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
Internal roadways	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
Parking and other paved areas	<u>7.8</u>	<u>0</u>	<u>7.8</u>
Other altered areas	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
Undeveloped areas	<u>79.5</u>	<u>26.7</u>	<u>79.5</u>
<b>Total: Project Site Acreage</b>	<u>87.3</u>	<u>26.7</u>	<u>87.3</u>

- B. Has any part of the project site been in active agricultural use in the last five years?**  
 Yes  No; if yes, how many acres of land in agricultural use (with prime state or locally important agricultural soils) will be converted to nonagricultural use?
- C. Is any part of the project site currently or proposed to be in active forestry use?**  
 Yes  No; if yes, please describe current and proposed forestry activities and indicate whether any part of the site is the subject of a forest management plan approved by the Department of Conservation and Recreation:
- D. Does any part of the project involve conversion of land held for natural resources purposes in accordance with Article 97 of the Amendments to the Constitution of the Commonwealth to any purpose not in accordance with Article 97?**  Yes  No; if yes, describe:
- E. Is any part of the project site currently subject to a conservation restriction, preservation restriction, agricultural preservation restriction or watershed preservation restriction?**  
 Yes  No; if yes, does the project involve the release or modification of such restriction?  
 Yes  No; if yes, describe:
- F. Does the project require approval of a new urban redevelopment project or a fundamental change in an existing urban redevelopment project under M.G.L.c.121A?**  Yes  No; if yes, describe:
- G. Does the project require approval of a new urban renewal plan or a major modification of an existing urban renewal plan under M.G.L.c.121B?**  Yes  No; if yes, describe:

**III. Consistency**

- A. Identify the current municipal comprehensive land use plan**

Title: Sustainable Sudbury Master Plan Date: 2001

*\* Sudbury does not have a more recent Master Plan*

Title: Master Plan 2014: Town of Hudson, Massachusetts Date: 2014

- B. Describe the project’s consistency with that plan with regard to:**

**1) economic development:** The Project will support and provide reliable energy for future economic development in the area.



- 2) **adequacy of infrastructure:** The Project is intended to provide a continued reliable source of electricity to Eversource and Hudson Light and Power Department's customers.
- 3) **open space impacts:** The Project will be built within an existing inactive MBTA corridor and will not have any direct impacts to open space. The Project provides the opportunity to advance the development of the Mass Central Rail Trail. This supports Sudbury's goal as stated in the Sustainable Sudbury Master Plan, to create "trail linkages including new trails, bike paths, walkways and greenways" and to specifically support the "proposed east west bike trail along the old MBTA railroad bed from Wayland into Marlborough... as it will allow regional, non-motorized movement between towns." It also supports Hudson's goals to "develop connections and linkages of open space and recreation areas through development of trails," and to "collaborate with the Department of Conservation and Recreation in the development of the Mass Central Branch Rail Trail along the former Mass Central Branch Railroad.
- 4) **compatibility with adjacent land uses:** The Project will be built within an existing inactive MBTA ROW. The installation of the transmission line underground is compatible with Sudbury's goal to minimize overhead utility wires and poles throughout the Town and helps to maintain the existing character of residential neighborhoods by allowing for a vegetative buffer along the transmission corridor/multi-use path. As stated above, the Project also supports Hudson's goal to "develop connections and linkages of open space and recreation areas through development of trails."

The Company is committed to continued discussions to explore the potential to work cooperatively with the SVT, USFWS, DCR and the local land management agencies to develop a vegetation management strategy along the corridor that promotes and helps achieve the current habitat management goals along the MBTA ROW and that is compatible with the safe operation and maintenance of the new transmission line.

**C. Identify the current Regional Policy Plan of the applicable Regional Planning Agency (RPA)**

**RPA:** Metropolitan Area Planning Council

**Title:** MetroFuture: Making a Greater Boston Region

**Date:** 2008

**D. Describe the project's consistency with that plan with regard to:**

- 1) **economic development:** The Project will support and provide reliable energy for future economic development in the area. It will also support the Plan's goal to focus economic growth in areas that provide greater transportation choices, including those that are accessible on foot or bike.
- 2) **adequacy of infrastructure:** The Project is intended to provide a continued reliable source of electricity to Eversource and Hudson Light and Power Department's customers.
- 3) **open space impacts:** The Project will be built within an existing inactive MBTA ROW and will not have any direct impacts to open space. The Project provides the opportunity to advance the development of the Mass Central Rail Trail, which supports the Plan's goal to create a robust network of, and expand access to, protected open spaces, parks, and greenways.

## **RARE SPECIES SECTION**

### **I. Thresholds / Permits**

- A. Will the project meet or exceed any review thresholds related to rare species or habitat (see 301 CMR 11.03(2))?**  Yes  No; if yes, specify, in quantitative terms:

To be determined. The Company will continue to work with NHESP to minimize impacts to habitat for the listed species to the extent possible.

*(NOTE: If you are uncertain, it is recommended that you consult with the Natural Heritage and Endangered Species Program (NHESP) prior to submitting the ENF.)*

- B. Does the project require any state permits related to rare species or habitat?**  
 Yes  No

There is a possibility that the Project may require a Conservation and Management Permit. The Company is continuing to coordinate with NHESP to finalize plans to avoid and minimize impacts to rare species and habitat.

- C. Does the project site fall within mapped rare species habitat (Priority or Estimated Habitat?) in the current Massachusetts Natural Heritage Atlas (attach relevant page)?**  
 Yes  No.

The Project ROW crosses two areas of mapped habitat: PH 1516/EH 38 in the vicinity of the Sudbury Substation, and PH 687/EH 648, in the vicinity of Hop Brook and the large complex of conservation lands at the municipal borders of Sudbury, Marlborough, and Hudson.

- D. If you answered "No" to all questions A, B and C, proceed to the Wetlands, Waterways, and Tidelands Section. If you answered "Yes" to either question A or question B, fill out the remainder of the Rare Species section below.**

### **II. Impacts and Permits**

- A. Does the project site fall within Priority or Estimated Habitat in the current Massachusetts Natural Heritage Atlas (attach relevant page)?**  Yes  No. If yes,

- 1. Have you consulted with the Division of Fisheries and Wildlife Natural Heritage and Endangered Species Program (NHESP)?**  Yes  No; if yes, have you received a determination as to whether the project will result in the "take" of a rare species?  Yes  No; if yes, attach the letter of determination to this submission.
- 2. Will the project "take" an endangered, threatened, and/or species of special concern in accordance with M.G.L. c.131A (see also 321 CMR 10.04)?**  
 Yes  No; if yes, provide a summary of proposed measures to minimize and mitigate rare species impacts.

To be determined. The Company will continue to work with NHESP to minimize impacts to habitat for the listed species to the extent possible.

**3. Which rare species are known to occur within the Priority or Estimated Habitat?**

*Priority Habitat 1516 and Estimated Habitat 38:*

<b>Scientific Name</b>	<b>Common Name</b>	<b>Taxonomic Group</b>	<b>State Status</b>
<i>Ambystoma laterale</i>	Blue-Spotted Salamander	Amphibian	Special concern

*Priority Habitat 687 and Estimated Habitat 648:*

<b>Scientific Name</b>	<b>Common Name</b>	<b>Taxonomic Group</b>	<b>State Status</b>
<i>Terrapene carolina</i>	Eastern Box Turtle	Reptile	Special concern
<i>Glyptemys insculpta</i>	Wood Turtle	Reptile	Special concern
<i>Caprimulgus vociferous</i>	Eastern Whip-poor-will	Bird	Special concern

**4. Has the site been surveyed for rare species in accordance with the Massachusetts Endangered Species Act?  Yes  No**

**5. If your project is within Estimated Habitat, have you filed a Notice of Intent or received an Order of Conditions for this project?  Yes  No; if yes, did you send a copy of the Notice of Intent to the Natural Heritage and Endangered Species Program, in accordance with the Wetlands Protection Act regulations?  Yes  No**

**B. Will the project "take" an endangered, threatened, and/or species of special concern in accordance with M.G.L. c.131A (see also 321 CMR 10.04)?  Yes  No; if yes, provide a summary of proposed measures to minimize and mitigate impacts to significant habitat:**

To be determined. The Company will continue to work with NHESP to minimize impacts to habitat for the listed species to the extent possible.

## WETLANDS, WATERWAYS, AND TIDELANDS SECTION

### I. Thresholds / Permits

A. Will the project meet or exceed any review thresholds related to wetlands, waterways, and tidelands (see 301 CMR 11.03(3))?  Yes  No; if yes, specify, in quantitative terms:

- 301 CMR 11.03(3)(b)1.d. alteration of 5,000 or more sf of bordering or isolated vegetated wetlands (provided that a permit is required)
- 301 CMR 11.03(b)1.f. alteration of ½ or more acres of any other wetlands

B. Does the project require any state permits (or a local Order of Conditions) related to wetlands, waterways, or tidelands?  Yes  No; if yes, specify which permit:

The Project will require a 401 Water Quality Certificate and Orders of Conditions from the Towns of Sudbury, Stow, and Hudson.

C. If you answered "No" to both questions A and B, proceed to the Water Supply Section. If you answered "Yes" to either question A or question B, fill out the remainder of the Wetlands, Waterways, and Tidelands Section below.

### II. Wetlands Impacts and Permits

A. Does the project require a new or amended Order of Conditions under the Wetlands Protection Act (M.G.L. c.131A)?  Yes  No;  
 if yes, has a Notice of Intent been filed?  Yes  No;  
 if yes, list the date and MassDEP file number: \_\_\_\_\_;  
 if yes, has a local Order of Conditions been issued?  Yes  No;  
 Was the Order of Conditions appealed?  Yes  No.  
 Will the project require a Variance from the Wetlands regulations?  Yes  No.

B. Describe any proposed permanent or temporary impacts to wetland resource areas located on the project site:

Construction of the Project within the MBTA ROW will result in impacts to wetland resource areas in the towns of Sudbury, Stow, and Hudson as a result of tree clearing and creation of a 22-foot-wide construction platform. The ROW will need to be cleared to a width of 30 feet along the entire length, with temporary 40-foot-by-50-foot areas in splice vault locations. These expanded areas will be allowed to grow back to maintain a 30-foot width after construction is completed. The construction platform needed to install the access road and transmission line will result in permanent fill.

C. Estimate the extent and type of impact that the project will have on wetland resources, and indicate whether the impacts are temporary or permanent:

<u>Coastal Wetlands</u>	<u>Area (square feet) or Length (linear feet)</u>	<u>Temporary or Permanent Impact?</u>
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NO TEMPORARY OR PERMANENT IMPACTS TO COASTAL WETLANDS

Land Under the Ocean	_____	_____
Designated Port Areas	_____	_____
Coastal Beaches	_____	_____
Coastal Dunes	_____	_____
Barrier Beaches	_____	_____
Coastal Banks	_____	_____

Rocky Intertidal Shores		
Salt Marshes		
Land Under Salt Ponds		
Land Containing Shellfish		
Fish Runs		
Land Subject to Coastal Storm Flowage		

**Inland Wetlands**

\* NOTE: The impacted resource areas below overlap, and cannot be added together to arrive at a total amount of impact.

Bank (lf)	32 LF	total
	12 LF	permanent
	20 LF	temporary
Bordering Vegetated Wetlands	13,794 SF	total
	12,962 SF	permanent
	832 SF	temporary
Isolated Vegetated Wetlands	0	0
Land under Water	0	0
Isolated Land Subject to Flooding	0	0
Bordering Land Subject to Flooding	69,122 SF	total
	55,482 SF	permanent
	13,640 SF	temporary
Riverfront Area	239,309 SF	total
	170,302 SF	permanent
	69,007 SF	temporary

**D. Is any part of the project:**

1. proposed as a limited project?  Yes  No; if yes, what is the area (in sf) see Section II.C.

The entire Project is proposed as a Limited Project pursuant to 310 CMR 10.53(3)(d) – construction of electric transmission lines.

2. the construction or alteration of a dam?  Yes  No; if yes, describe:  
3. fill or structure in a velocity zone or regulatory floodway?  Yes  No  
4. dredging or disposal of dredged material?  Yes  No; if yes, describe the volume of dredged material and the proposed disposal site:  
5. a discharge to an Outstanding Resource Water (ORW) or an Area of Critical Environmental Concern (ACEC)?  Yes  No  
6. subject to a wetlands restriction order?  Yes  No; if yes, identify the area (in sf):  
7. located in buffer zones?  Yes  No; if yes, how much (in sf) 448,005

**E. Will the project:**

1. be subject to a local wetlands ordinance or bylaw?  Yes  No  
2. alter any federally-protected wetlands not regulated under state law?  Yes  No; if yes, what is the area (sf)?

**III. Waterways and Tidelands Impacts and Permits**

- A. Does the project site contain waterways or tidelands (including filled former tidelands) that are subject to the Waterways Act, M.G.L.c.91?  Yes  No; if yes, is there a current Chapter 91 License or Permit affecting the project site?  Yes  No; if yes, list the date and license or permit number and provide a copy of the historic map used to determine extent of filled tidelands:**

Potential navigable waters the Project will cross include: Fort Meadow Brook in Hudson and Hop Brook in Sudbury.

- B. Does the project require a new or modified license or permit under M.G.L. c.91?  Yes  No; if yes, how many acres of the project site subject to M.G.L. c.91 will be for non-water-dependent use? Current \_\_\_\_\_ Change \_\_\_\_\_ Total \_\_\_\_\_ If yes, how many square feet of solid fill or pile-supported structures (in sf)?**

To be determined upon final design. It is the Company's intention to stay within the original footprint for these crossings, which would not require a new or modified Chapter 91 license or permit.

- C. For non-water-dependent use projects, indicate the following:**

Area of filled tidelands on the site: \_\_\_\_\_ 0 \_\_\_\_\_

Area of filled tidelands covered by buildings: \_\_\_\_\_ 0 \_\_\_\_\_

For portions of site on filled tidelands, list ground floor uses and area of each use:

\_\_\_\_\_ 0 \_\_\_\_\_

Does the project include new non-water-dependent uses located over flowed tidelands?  Yes  No

Height of building on filled tidelands \_\_\_\_\_

Also show the following on a site plan: Mean High Water, Mean Low Water, Water-dependent Use Zone, location of uses within buildings on tidelands, and interior and exterior areas and facilities dedicated for public use, and historic high and historic low water marks.

- D. Is the project located on landlocked tidelands?  Yes  No; if yes, describe the project's impact on the public's right to access, use and enjoy jurisdictional tidelands and describe measures the project will implement to avoid, minimize or mitigate any adverse impact:**
- E. Is the project located in an area where low groundwater levels have been identified by a municipality or by a state or federal agency as a threat to building foundations?  Yes  No; if yes, describe the project's impact on groundwater levels and describe measures the project will implement to avoid, minimize or mitigate any adverse impact:**
- F. Is the project non-water-dependent and located on landlocked tidelands or waterways or tidelands subject to the Waterways Act and subject to a mandatory EIR?  Yes  No; (NOTE: If yes, then the project will be subject to Public Benefit Review and Determination.)**

- G. Does the project include dredging?  Yes  No; if yes, answer the following questions:**

What type of dredging? Improvement \_\_\_ Maintenance \_\_\_ Both \_\_\_

What is the proposed dredge volume, in cubic yards (cys) \_\_\_\_\_

What is the proposed dredge footprint \_\_\_ length (ft) \_\_\_ width (ft) \_\_\_ depth (ft);  
Will dredging impact the following resource areas?

Intertidal  Yes  No; if yes, \_\_\_ sq ft

Outstanding Resource Waters  Yes  No; if yes, \_\_\_ sq ft

Other resource area (i.e. shellfish beds, eel grass beds)  Yes  No;  
if yes \_\_\_ sq ft

If yes to any of the above, have you evaluated appropriate and practicable  
steps to: 1) avoidance; 2) if avoidance is not possible, minimization; 3)  
if either avoidance or minimize is not possible, mitigation?

If no to any of the above, what information or documentation was used to  
support this determination?

Provide a comprehensive analysis of practicable alternatives for  
improvement dredging in accordance with 314 CMR 9.07(1)(b).

Physical and chemical data of the sediment shall be included in the  
comprehensive analysis.

#### Sediment Characterization

Existing gradation analysis results?  Yes  No; if yes, provide results.

Existing chemical results for parameters listed in 314 CMR 9.07(2)(b)6?

Yes  No; if yes, provide results.

Do you have sufficient information to evaluate feasibility of the following  
management options for dredged sediment? If yes, check the appropriate  
option.

Beach Nourishment \_\_\_

Unconfined Ocean Disposal \_\_\_

Confined Disposal:

Confined Aquatic Disposal (CAD) \_\_\_

Confined Disposal Facility (CDF) \_\_\_

Landfill Reuse in accordance with COMM-97-001 \_\_\_

Shoreline Placement \_\_\_

Upland Material Reuse \_\_\_

In-State landfill disposal \_\_\_

Out-of-state landfill disposal \_\_\_

*(NOTE: This information is required for a 401 Water Quality Certification.)*

#### IV. Consistency:

A. Does the project have effects on the coastal resources or uses, and/or is the project  
located within the Coastal Zone?  Yes  No; if yes, describe these effects and the  
projects consistency with the policies of the Office of Coastal Zone Management:

B. Is the project located within an area subject to a Municipal Harbor Plan?  Yes  No;  
if yes, identify the Municipal Harbor Plan and describe the project's consistency with that  
plan:

## WATER SUPPLY SECTION

### I. Thresholds / Permits

- A. Will the project meet or exceed any review thresholds related to water supply (see 301 CMR 11.03(4))?  Yes  No; if yes, specify, in quantitative terms:
- B. Does the project require any state permits related to water supply?  Yes  No; if yes, specify which permit:
- C. If you answered "No" to both questions A and B, proceed to the Wastewater Section. If you answered "Yes" to either question A or question B, fill out the remainder of the Water Supply Section below.

### II. Impacts and Permits

- A. Describe, in gallons per day (gpd), the volume and source of water use for existing and proposed activities at the project site:

	<u>Existing</u>	<u>Change</u>	<u>Total</u>
Municipal or regional water supply	_____	_____	_____
Withdrawal from groundwater	_____	_____	_____
Withdrawal from surface water	_____	_____	_____
Interbasin transfer	_____	_____	_____

*(NOTE: Interbasin Transfer approval will be required if the basin and community where the proposed water supply source is located is different from the basin and community where the wastewater from the source will be discharged.)*

- B. If the source is a municipal or regional supply, has the municipality or region indicated that there is adequate capacity in the system to accommodate the project?  
 Yes  No
- C. If the project involves a new or expanded withdrawal from a groundwater or surface water source, has a pumping test been conducted?  Yes  No; if yes, attach a map of the drilling sites and a summary of the alternatives considered and the results.  
\_\_\_\_\_
- D. What is the currently permitted withdrawal at the proposed water supply source (in gallons per day)? \_\_\_\_\_ Will the project require an increase in that withdrawal?  
 Yes  No; if yes, then how much of an increase (gpd)? \_\_\_\_\_
- E. Does the project site currently contain a water supply well, a drinking water treatment facility, water main, or other water supply facility, or will the project involve construction of a new facility?  Yes  No. If yes, describe existing and proposed water supply facilities at the project site:

	<u>Permitted Flow</u>	<u>Existing Avg Daily Flow</u>	<u>Project Flow</u>	<u>Total</u>
Capacity of water supply well(s) (gpd)	_____	_____	_____	_____
Capacity of water treatment plant (gpd)	_____	_____	_____	_____

- F. If the project involves a new interbasin transfer of water, which basins are involved, what is the direction of the transfer, and is the interbasin transfer existing or proposed?



**G. Does the project involve:**

1. new water service by the Massachusetts Water Resources Authority or other agency of the Commonwealth to a municipality or water district?  Yes  No
2. a Watershed Protection Act variance?  Yes  No; if yes, how many acres of alteration?
3. a non-bridged stream crossing 1,000 or less feet upstream of a public surface drinking water supply for purpose of forest harvesting activities?  Yes  No

**III. Consistency**

Describe the project's consistency with water conservation plans or other plans to enhance water resources, quality, facilities and services:

## WASTEWATER SECTION

### I. Thresholds / Permits

- A. Will the project meet or exceed any review thresholds related to wastewater (see 301 CMR 11.03(5))?  Yes  No; if yes, specify, in quantitative terms:
- B. Does the project require any state permits related to wastewater?  Yes  No; if yes, specify which permit:
- C. If you answered "No" to both questions A and B, proceed to the Transportation—Traffic Generation Section. If you answered "Yes" to either question A or question B, fill out the remainder of the Wastewater Section below.

### II. Impacts and Permits

- A. Describe the volume (in gallons per day) and type of disposal of wastewater generation for existing and proposed activities at the project site (calculate according to 310 CMR 15.00 for septic systems or 314 CMR 7.00 for sewer systems):

	<u>Existing</u>	<u>Change</u>	<u>Total</u>
Discharge of sanitary wastewater	_____	_____	_____
Discharge of industrial wastewater	_____	_____	_____
TOTAL	_____	_____	_____

	<u>Existing</u>	<u>Change</u>	<u>Total</u>
Discharge to groundwater	_____	_____	_____
Discharge to outstanding resource water	_____	_____	_____
Discharge to surface water	_____	_____	_____
Discharge to municipal or regional wastewater facility	_____	_____	_____
TOTAL	_____	_____	_____

- B. Is the existing collection system at or near its capacity?  Yes  No; if yes, then describe the measures to be undertaken to accommodate the project's wastewater flows:
- C. Is the existing wastewater disposal facility at or near its permitted capacity?  Yes  No; if yes, then describe the measures to be undertaken to accommodate the project's wastewater flows:
- D. Does the project site currently contain a wastewater treatment facility, sewer main, or other wastewater disposal facility, or will the project involve construction of a new facility?  Yes  No; if yes, describe as follows:

	<u>Permitted</u>	<u>Existing Avg Daily Flow</u>	<u>Project Flow</u>	<u>Total</u>
Wastewater treatment plant capacity (in gallons per day)	_____	_____	_____	_____

- E. If the project requires an interbasin transfer of wastewater, which basins are involved, what is the direction of the transfer, and is the interbasin transfer existing or new?

*(NOTE: Interbasin Transfer approval may be needed if the basin and community where wastewater will be discharged is different from the basin and community where the source of water supply is located.)*

- F. Does the project involve new sewer service by the Massachusetts Water Resources Authority (MWRA) or other Agency of the Commonwealth to a municipality or sewer district?  Yes  No
- G. Is there an existing facility, or is a new facility proposed at the project site for the storage, treatment, processing, combustion or disposal of sewage sludge, sludge ash, grit, screenings, wastewater reuse (gray water) or other sewage residual materials?  Yes  No; if yes, what is the capacity (tons per day):

	<u>Existing</u>	<u>Change</u>	<u>Total</u>
Storage	_____	_____	_____
Treatment	_____	_____	_____
Processing	_____	_____	_____
Combustion	_____	_____	_____
Disposal	_____	_____	_____

- H. Describe the water conservation measures to be undertaken by the project, and other wastewater mitigation, such as infiltration and inflow removal.

**III. Consistency**

- A. Describe measures that the proponent will take to comply with applicable state, regional, and local plans and policies related to wastewater management:
- B. If the project requires a sewer extension permit, is that extension included in a comprehensive wastewater management plan?  Yes  No; if yes, indicate the EEA number for the plan and whether the project site is within a sewer service area recommended or approved in that plan:

## **TRANSPORTATION SECTION (TRAFFIC GENERATION)**

### **I. Thresholds / Permit**

- A. Will the project meet or exceed any review thresholds related to traffic generation (see 301 CMR 11.03(6))?**  Yes  No; if yes, specify, in quantitative terms:
- B. Does the project require any state permits related to state-controlled roadways?**  
 Yes  No; if yes, specify which permit:
- C. If you answered "No" to both questions A and B, proceed to the Roadways and Other Transportation Facilities Section. If you answered "Yes" to either question A or question B, fill out the remainder of the Traffic Generation Section below.**

### **II. Traffic Impacts and Permits**

- A. Describe existing and proposed vehicular traffic generated by activities at the project site:**

	<u>Existing</u>	<u>Change</u>	<u>Total</u>
Number of parking spaces	_____	_____	_____
Number of vehicle trips per day	_____	_____	_____
ITE Land Use Code(s):	_____	_____	_____

- B. What is the estimated average daily traffic on roadways serving the site?**

<u>Roadway</u>	<u>Existing</u>	<u>Change</u>	<u>Total</u>
1. _____	_____	_____	_____
2. _____	_____	_____	_____
3. _____	_____	_____	_____

- C. If applicable, describe proposed mitigation measures on state-controlled roadways that the project proponent will implement:**
- D. How will the project implement and/or promote the use of transit, pedestrian and bicycle facilities and services to provide access to and from the project site?**
- E. Is there a Transportation Management Association (TMA) that provides transportation demand management (TDM) services in the area of the project site?**  Yes  No; if yes, describe if and how will the project will participate in the TMA:
- F. Will the project use (or occur in the immediate vicinity of) water, rail, or air transportation facilities?**  Yes  No; if yes, generally describe:
- G. If the project will penetrate approach airspace of a nearby airport, has the proponent filed a Massachusetts Aeronautics Commission Airspace Review Form (780 CMR 111.7) and a Notice of Proposed Construction or Alteration with the Federal Aviation Administration (FAA) (CFR Title 14 Part 77.13, forms 7460-1 and 7460-2)?**

### **III. Consistency**

**Describe measures that the proponent will take to comply with municipal, regional, state, and federal plans and policies related to traffic, transit, pedestrian and bicycle transportation facilities and services:**

**TRANSPORTATION SECTION (ROADWAYS AND OTHER TRANSPORTATION FACILITIES)**

**I. Thresholds**

**A. Will the project meet or exceed any review thresholds related to roadways or other transportation facilities (see 301 CMR 11.03(6))?**  Yes  No; if yes, specify, in quantitative terms:

**B. Does the project require any state permits related to roadways or other transportation facilities?**  Yes  No; if yes, specify which permit:

State Highway Access Permit

**C. If you answered "No" to both questions A and B, proceed to the Energy Section. If you answered "Yes" to either question A or question B, fill out the remainder of the Roadways Section below.**

**II. Transportation Facility Impacts**

**A. Describe existing and proposed transportation facilities in the immediate vicinity of the project site:**

The Project will cross Route 20 and Route 62. The Company will coordinate with MassDOT to ensure construction activities and placement of the new transmission line will not adversely impact traffic on these roads.

**B. Will the project involve any**

- |  |           |
|--|-----------|
| 1. Alteration of bank or terrain (in linear feet)? | <u>0</u>  |
| 2. Cutting of living public shade trees (number)?  | <u>12</u> |
| 3. Elimination of stone wall (in linear feet)?     | <u>*</u>  |

\* To be determined upon final design

**III. Consistency—Describe the project's consistency with other federal, state, regional, and local plans and policies related to traffic, transit, pedestrian and bicycle transportation facilities and services, including consistency with the applicable regional transportation plan and the Transportation Improvements Plan (TIP), the State Bicycle Plan, and the State Pedestrian Plan:**

The Project will have no impact on regional transportation plans.

## ENERGY SECTION

### I. Thresholds / Permits

- A. Will the project meet or exceed any review thresholds related to energy (see 301 CMR 11.03(7))?  Yes  No; if yes, specify, in quantitative terms:

(b)4. Construction of 115-kV electric transmission line greater than one mile in length along an unused right of way.

- B. Does the project require any state permits related to energy?  Yes  No; if yes, specify which permit:

EFSB/DPU:

Approval to construct, G.L. c. 164, § 69J and § 72  
Request for zoning exemptions, G.L. c. 40A, §3

- C. If you answered "No" to both questions A and B, proceed to the Air Quality Section. If you answered "Yes" to either question A or question B, fill out the remainder of the Energy Section below.

### II. Impacts and Permits

- A. Describe existing and proposed energy generation and transmission facilities at the project site:

	<u>Existing</u>	<u>Change</u>	<u>Total</u>
Capacity of electric generating facility (megawatts)	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
Length of fuel line (in miles)	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
Length of transmission lines (in miles)	<u>0</u>	<u>9.01</u>	<u>9.01</u>
Capacity of transmission lines (in kilovolts)	<u>0</u>	<u>115</u>	<u>115</u>

- B. If the project involves construction or expansion of an electric generating facility, what are:

1. the facility's current and proposed fuel source(s)?
2. the facility's current and proposed cooling source(s)?

Not applicable

- C. If the project involves construction of an electrical transmission line, will it be located on a new, unused, or abandoned right of way?  Yes  No; if yes, please describe:

The Project will be constructed along an existing inactive MBTA ROW (the former Mass Central Branch).

- D. Describe the project's other impacts on energy facilities and services:

The Project is one of approximately 40 transmission projects that emerged from an extended study of the regional transmission system performed by ISO New England Inc. ("ISO-NE") that identified and addressed reliability needs for the New England transmission system that serves northern Massachusetts and southern New Hampshire. In addition to maintaining the reliable and secure delivery of electricity, these transmission solutions substantially increase the power import capacity to the Greater Boston area, enabling access to lower cost, cleaner power sources and, in the aggregate, are expected to save Greater Boston area customers hundreds of millions of dollars annually in reduced transmission congestion costs while

allowing lower cost electricity generation from outside the area to serve capacity needs within the area.

### III. Consistency

#### **Describe the project's consistency with state, municipal, regional, and federal plans and policies for enhancing energy facilities and services:**

The Project is consistent with all state plans/policies as set forth in Chapter 164 of the General Laws and in other federal, state and local environmental policies for enhancing energy facilities and services.

The Restructuring Act provides that the Company must demonstrate that the Project minimizes environmental impacts consistent with the minimization of costs associated with mitigation, control, and reduction of the environmental impacts of the Project. Accordingly, an assessment of all impacts of a proposed facility is necessary to determine whether an appropriate balance is achieved both among conflicting environmental concerns as well as among environmental impacts, cost, and reliability. A facility that achieves the appropriate balance thereby meets the Chapter 164 requirement to minimize environmental impacts at the lowest possible cost. The Company compared a range of alternative projects and proposed specific plans to mitigate environmental impacts associated with the construction, operation, and maintenance of the proposed transmission line, consistent with cost minimization.

The Company will obtain all environmental approvals and permits required by federal, state, and local agencies and will construct and operate the Project to fully comply with Federal, state and municipal regulations and environmental policies. Thus, the Project will contribute to a reliable, low cost, diverse energy supply for the Commonwealth while avoiding, minimizing, and mitigating environmental impacts to the maximum extent practicable.

In addition, the Project is also consistent with the Commonwealth's Environmental Justice ("EJ") Policy, as promulgated by the predecessor to the EEA and as subsequently updated by then-Governor Patrick through Executive Order #552 signed on November 25, 2014, because the Company is pursuing an inclusive community outreach plan to facilitate the meaningful opportunity to participate by all and because the Project does not exceed any environmental impacts thresholds that would necessitate enhanced analysis under the EJ Policy. As such, the Project is consistent with the Commonwealth's environmental policies.

The Green Communities Act is a comprehensive, multi-faceted energy reform bill that encourages energy and building efficiency, promotes renewable energy, creates green communities, implements elements of the Regional Greenhouse Gas Initiative, and provides market incentives and funding for various types of energy generation. The Green Communities Act (as amended and supplemented by St. 2012, c. 209, An Act Relative to Competitively Priced Electricity), can be expected to result in greater renewable supplies and substantial new conservation initiatives in future years. The improvements to the transmission system in the Marlborough Subarea of Subarea D will strengthen and improve the reliability of the regional transmission system. While the primary Project purpose is improved reliability consistent with ISO-NE requirements, the more robust system will enable a more efficient and flexible operation of the grid consistent with the Green Communities Act.

On August 7, 2008, then-Massachusetts Governor Patrick signed into law the Global Warming Solutions Act ("GWSA"), which established aggressive greenhouse gas ("GHG") emissions reduction targets of 25% from 1990 levels by 2020 and 80% from 1990 levels by 2050. Pursuant to the GWSA, the Secretary of the EEA issued the Clean Energy & Climate Plan for 2020 in December of 2010. Among other provisions, the GWSA obligates administrative agencies such as the Siting Board, in considering and issuing permits, to consider reasonably foreseeable climate change impacts (e.g., additional GHG emissions) and related effects (e.g., sea level rise).

The proposed improvements to the transmission system in the Marlborough Subarea of Subarea D will have no adverse climate change impacts or negative effects on sea levels. Consequently, the Project is consistent with the GWSA.

The Project, which will contribute to the long-term maintenance and reliability of the electric transmission system in the Marlborough Subarea of Subarea D and surrounding communities, will be constructed and operated in compliance with Massachusetts' policies regarding resource use and development. For example, in 2007, the EEA's Smart Growth/Smart Energy policy established the Commonwealth's Sustainable Development Principles, including: (1) supporting the revitalization of city centers and neighborhoods by promoting development that is compact, conserves land, protects historic resources and integrates uses; (2) encouraging remediation and reuse of existing sites, structures and infrastructure rather than new construction in undeveloped areas; and (3) protecting environmentally sensitive lands, natural resources, critical habitats, wetlands and water resources and cultural and historic landscapes. The Project will support these principles because the Project will be located primarily within an MBTA ROW and existing streets and does not require the establishment of new rights-of-way; thus, no previously undisturbed property will be affected by the siting, construction or installation of the Project.



## AIR QUALITY SECTION

### I. Thresholds

- A. Will the project meet or exceed any review thresholds related to air quality (see 301 CMR 11.03(8))?  Yes  No; if yes, specify, in quantitative terms:
- B. Does the project require any state permits related to air quality?  Yes  No; if yes, specify which permit:
- C. If you answered "No" to both questions A and B, proceed to the Solid and Hazardous Waste Section. If you answered "Yes" to either question A or question B, fill out the remainder of the Air Quality Section below.

### II. Impacts and Permits

- A. Does the project involve construction or modification of a major stationary source (see 310 CMR 7.00, Appendix A)?  Yes  No; if yes, describe existing and proposed emissions (in tons per day) of:

	<u>Existing</u>	<u>Change</u>	<u>Total</u>
Particulate matter	_____	_____	_____
Carbon monoxide	_____	_____	_____
Sulfur dioxide	_____	_____	_____
Volatile organic compounds	_____	_____	_____
Oxides of nitrogen	_____	_____	_____
Lead	_____	_____	_____
Any hazardous air pollutant	_____	_____	_____
Carbon dioxide	_____	_____	_____

- B. Describe the project's other impacts on air resources and air quality, including noise impacts:

### III. Consistency

- A. Describe the project's consistency with the State Implementation Plan:
- B. Describe measures that the proponent will take to comply with other federal, state, regional, and local plans and policies related to air resources and air quality:

## **SOLID AND HAZARDOUS WASTE SECTION**

### **I. Thresholds / Permits**

- A. Will the project meet or exceed any review thresholds related to solid or hazardous waste (see 301 CMR 11.03(9))?  Yes  No; if yes, specify, in quantitative terms:
- B. Does the project require any state permits related to solid and hazardous waste?  Yes  No; if yes, specify which permit:
- C. If you answered "No" to both questions A and B, proceed to the Historical and Archaeological Resources Section. If you answered "Yes" to either question A or question B, fill out the remainder of the Solid and Hazardous Waste Section below.

### **II. Impacts and Permits**

- A. Is there any current or proposed facility at the project site for the storage, treatment, processing, combustion or disposal of solid waste?  Yes  No; if yes, what is the volume (in tons per day) of the capacity:

	<u>Existing</u>	<u>Change</u>	<u>Total</u>
Storage	_____	_____	_____
Treatment, processing	_____	_____	_____
Combustion	_____	_____	_____
Disposal	_____	_____	_____

- B. Is there any current or proposed facility at the project site for the storage, recycling, treatment or disposal of hazardous waste?  Yes  No; if yes, what is the volume (in tons or gallons per day) of the capacity:

	<u>Existing</u>	<u>Change</u>	<u>Total</u>
Storage	_____	_____	_____
Recycling	_____	_____	_____
Treatment	_____	_____	_____
Disposal	_____	_____	_____

- C. If the project will generate solid waste (for example, during demolition or construction), describe alternatives considered for re-use, recycling, and disposal:
- D. If the project involves demolition, do any buildings to be demolished contain asbestos?  
 Yes  No
- E. Describe the project's other solid and hazardous waste impacts (including indirect impacts):

### **III. Consistency**

Describe measures that the proponent will take to comply with the State Solid Waste Master Plan:

## **HISTORICAL AND ARCHAEOLOGICAL RESOURCES SECTION**

### **I. Thresholds / Impacts**

- A. Have you consulted with the Massachusetts Historical Commission?  Yes  No; if yes, attach correspondence. For project sites involving lands under water, have you consulted with the Massachusetts Board of Underwater Archaeological Resources?  Yes  No; if yes, attach correspondence**
- B. Is any part of the project site a historic structure, or a structure within a historic district, in either case listed in the State Register of Historic Places or the Inventory of Historic and Archaeological Assets of the Commonwealth?  Yes  No; if yes, does the project involve the demolition of all or any exterior part of such historic structure?  Yes  No; if yes, please describe:**

The Project crosses two historic districts (SUD.P and SUD.B) and four historic sites (SUD.282, HUD.908, SUD.900, and SUD.901), three of which are existing bridges along the MBTA ROW. The Project will reuse and rehabilitate these bridges such that they can accommodate a utility crossing. All three bridges have been individually inventoried but have not been assessed for eligibility for listing on the National Register of Historic Places. The Company will coordinate with MHC to ensure that this work is done in a manner that does not result in adverse effects to these resources.

- C. Is any part of the project site an archaeological site listed in the State Register of Historic Places or the Inventory of Historic and Archaeological Assets of the Commonwealth?  Yes  No; if yes, does the project involve the destruction of all or any part of such archaeological site?  Yes  No; if yes, please describe:**

The Project crosses SUD-HA-26. No impacts are anticipated to archaeological resources due to the previously disturbed nature of the ROW. However, the Company will continue to coordinate with Commonwealth Heritage Group, Inc., to evaluate potential impacts to archaeological resources prior to construction and to identify areas that should be avoided or which, if not able to be avoided, would necessitate measures to protect the cultural resource.

- D. If you answered "No" to all parts of both questions A, B and C, proceed to the Attachments and Certifications Sections. If you answered "Yes" to any part of either question A or question B, fill out the remainder of the Historical and Archaeological Resources Section below.**

### **II. Impacts**

**Describe and assess the project's impacts, direct and indirect, on listed or inventoried historical and archaeological resources:**

The Project crosses two historic districts (SUD.P and SUD.B) and four historic sites (SUD.282, HUD.908, SUD.900, and SUD.901), three of which are existing bridges along the MBTA ROW. The Project will reuse and rehabilitate these bridges such that they can accommodate a utility crossing. All three bridges have been individually inventoried but have not been assessed for eligibility for listing on the National Register of Historic Places.

The Project crosses SUD-HA-26. No impacts are anticipated to archaeological resources due to the previously disturbed nature of the ROW.

### III. Consistency

**Describe measures that the proponent will take to comply with federal, state, regional, and local plans and policies related to preserving historical and archaeological resources:**

The Company will coordinate with MHC to ensure that the bridge rehabilitation work is done in a manner that does not result in adverse effects to these resources.

No impacts are anticipated to archaeological resources due to the previously disturbed nature of the ROW. However, the Company will continue to coordinate with Commonwealth Heritage Group, Inc., to evaluate potential impacts to archaeological resources prior to construction and to identify areas that should be avoided or which, if not able to be avoided, would necessitate measures to protect the cultural resource. Procedures to handle unanticipated discoveries during construction will also be specified as part of a Construction Management Plan.

The Project and Noticed Variation will be subject to review under Section 106 of the National Historic Preservation Act (36 C.F.R 800, "Section 106") and will require a permit from the USACE. The Project and Noticed Variation will also be subject to review by the Massachusetts Historical Commission ("MHC") under G.L. c. 9 §§ 26–27C. The Company will coordinate with the USACE and MHC to avoid and/or minimize adverse effects to any eligible historic resource and to archaeological resources. As part of the USACE's Section 404 permit review, and pursuant to Section 106, the federal agency will also consult with Native American Tribes that express an interest in the cultural resources that may be affected by those portions of the routes subject to USACE and MHC jurisdiction. MHC and local historic commissions will provide review and comment under the MEPA process.

**CERTIFICATIONS:**

1. The Public Notice of Environmental Review has been/will be published in the following newspapers in accordance with 301 CMR 11.15(1):

(Name) MetroWest Daily News (Date) May 24, 2017

2. This form has been circulated to Agencies and Persons in accordance with 301 CMR 11.16(2).

**Signatures:**

5/8/17

**Date Signature of Responsible Officer or Proponent**

Denise Bartone  
**Name (print or type)**

Eversource  
**Firm/Agency**

247 Station Drive, SE270  
**Street**

Westwood, MA 02090  
**Municipality/State/Zip**

781-441-8174  
**Phone**

5/8/17

**Date Signature of person preparing ENF (if different from officer/proponent)**

Marc Bergeron  
**Name (print or type)**

VHB  
**Firm/Agency**

Union Station, 2 Washington Square, Suite 219  
**Street**

Worcester, MA 01604  
**Municipality/State/Zip**

508-752-1001  
**Phone**