



Friends of the Assabet River National Wildlife Refuge

*Working with the United States Fish and Wildlife Service
And serving our local communities*

Sudbury Conservation Commission
Department of Public Works Building
75 Old Lancaster Road
Sudbury, MA 01776

April 9, 2020

Re: Notice of Intent for Eversource Transmission & DCR Bike Trail

Dear Sudbury Conservation Commission:

The Friends of the Assabet River National Wildlife Refuge, is a 501 (c) 3 non-profit organization founded in 2000 to work with the United States Fish and Wildlife Service (USFWS) on the conservation and protection of the Assabet River National Wildlife Refuge (ARNWR) and collaborate with refuge staff to provide services to the Refuge and its visitors. Our work involves extensive invasive plants control using mechanical methods, educational programming for the visitor, staffing of the Visitor Center, and support of refuge wildlife management including re-introduction of Blandings Turtles. The Friends of the ARNWR write to share our concerns for, and comments on, the jointly filed Notice of Intent for the use of the abandoned railbed for an underground utility line and segment of DCR Rail Trail through the heart of the Refuge and the extensive surrounding conservation areas state, federal, municipal and private. Because of these lands and our work on them we strenuously object to the Eversource proposal to use this contaminated rail bed for its utility line.

On weekends, when the Visitor Center is open, visitors who come from local communities and out of state are eager to share their experiences on the trails, especially their positive impressions of the

quiet trails and numerous wildlife sightings. The results of our Friends 2020 survey which was sent to our 920 subscribers included feedback that 93.6% of respondents indicated that they valued the open space at the refuge. Also highly valued are hiking at 88.6% and bird watching at 67.1%. Each year the Friends of ARNWR receive generous donations from our supporters and we have maintained a steady membership over the 20 years since the refuge was established. Our speaker series provides our members and the surrounding communities with free access to wildlife science, research, projects, management techniques and identification among other topics.

The Friends of the ARNWR have consistently opposed the Eversource plan since 2016 because the Eversource proposal is located in the wrong place. We attach two prior comment letters from former Presidents of the Friends: Dave Manjarrez dated 2016 during the MEPA review and the affidavit of Elizabeth Truebenbach, dated 2019. As these letters reflect, this project belongs in the public streets not in woodland containing protected species habitat which we have worked to improve, or a few feet from sensitive Vernal Pools or requiring the excavation of contaminated rail bed or extensive fill in floodplain of three major tributaries and their feeder streams containing cold water fisheries.

We are also very concerned, as are MassDEP and other Conservation Commissions, about the extensive clear cutting to make a permanent 22 foot to 50-foot utility corridor. In our experience this level of disturbance will only remove native habitat and invite invasive plant species such as Japanese Knotweed, Bittersweet and Buckthorn. This in turn leads to an inclination to mow extensively and to use of herbicides. Neither belongs in this setting.

After reviewing the NOI for the Eversource Transmission Utility Line and DCR Rail Trail, Friends of the ARNWR is motivated to voice opposition to this dual project based on the unavoidable damage to the fragile ecosystems that support native wildlife including state listed species which includes the

Refuge. In this regard, it is our mission to protect the ARNWR refuge habitat for native plant and animal species for present and future generations.

This project has the potential to endanger wildlife as curiosity leads people off the rail trail, and lead to an increase in pollution from litter, increase in potentially harmful interactions between people and wildlife including the intentional or unintentional feeding of wildlife and wildlife ingestion of litter. Dogs are not allowed on the Refuge and the rail trail would permit dogs who have been shown to cause stress and injury to wildlife that are already acclimated to the nourishing habitats that meet their basic needs. Other risks include toxic dog waste not being picked up and the potential introduction of invasive plants in disturbed areas.

This project would effectively introduce a hard edge barrier to wildlife corridors on the southern portion of the refuge. The destructive methods for clearing the right of way will seriously jeopardize the integrity of the fragile ecosystems in the area. The quality and success of the restoration plans are likely be insufficient in replicating the current natural state of the beneficial habitats. The success of restoration attempts is uncertain, leading to permanent loss of species. As the Assabet River Rail Trail includes an unpaved section that runs 1.9 miles through the north side of the refuge along the Assabet River, Friends of the ARNWR are making an appeal for not paving the DCR rail trail in this section and creating a dirt road.

The wildlife found to inhabit the proposed construction area was identified by Susan Morse in Wildlife Study2 and Map Section C is the southern portion of the Refuge. Link to map: <https://sudbury.ma.us/conservationcommission/wildlife-study-2-map/>. Moose, mink, river otter, fisher and beaver, among others were noted. NHESP Certified and Potential Vernal Pools are also identified.

In the ARNWR Visitor Center exhibit hall, models of wetland and forest flora and fauna that visitors can expect to see as they explore the refuge are depicted. Many from the Wildlife Study2 are

included in the displays. We cannot to come to terms with the idea that these habitat areas that we and visitors to Assabet River NWR cherish and are so interested in learning about and viewing on the refuge will be destroyed.

The Eversource project is planned along the wrong route. We strongly urge that this utility line be installed underground along developed roadways to minimize disturbance.

Sincerely,

Paula Goodwin, President

Friends of the Assabet River National Wildlife Refuge