



Northern Middlesex Council of Governments

A Multi-Disciplinary Regional Planning Agency Serving:

Billerica – Chelmsford – Dracut – Dunstable – Lowell – Pepperell – Tewksbury – Tyngsborough – Westford

April 22, 2024

Rebecca Tepper, Secretary
Executive Office of Energy and Environmental Affairs
Attention: MEPA Office
Eva Vaughan: EOEEA #16813
100 Cambridge Street, Suite 900
Boston, MA 02114-2509

Re: EOEEA MEPA #16813 Sandy Pond to Tewksbury Reliability Project– Billerica, Chelmsford, Tewksbury, and Westford, Expanded Environmental Notification Form (EENF)

Dear Secretary Tepper,

The Northern Middlesex Council of Governments (NMCOG) regularly evaluates MEPA proposal notifications to determine those that may have a regional impact. Our role is to review projects for alignment with the Regional Strategic Plan for Greater Lowell, Northern Middlesex's regional policy plan, and other regional and local plans when relevant. As a regional planning agency, one of NMCOG's goals is to foster sustainable development.

The Sandy Pond to Tewksbury Reliability Project proposes refurbishing existing transmission lines owned by New England Power/National Grid to ensure more reliable, climate-ready, and resilient energy delivery. We commend the applicant's efforts to enhance the region's energy infrastructure to align with goals outlined in the State's Hazard Mitigation and Adaptation Plan. The project also aligns with goals outlined in NMCOG's Regional Strategic Plan. Both plans underscore the vital role of investing in electric utilities as critical tools for sustainable economic development. Additionally, this project supports the objectives of the Green Communities Act, aiming for ambitious advancements in renewable and alternative energy. The proposed enhancements are essential for modernizing and improving our energy infrastructure.

However, two critical aspects of the project require clarification by the applicant. It was not explicitly stated whether there would be an increase in voltage as part of the upgrade to the transmission lines. The applicant should provide details about potential increases in voltage. Additionally, the applicant should describe how the proposed enhancements will bolster reliability to accommodate rising energy demands.

We recommend including the following information in future filings: New England Power/National Grid's commitment to promoting climate adaptation and resiliency in the project's design, as outlined in this filing. The filing highlights improvements in electric supply reliability and the reinforcement of system resilience against climatic stressors by replacing aging wooden structures with durable, weather-resistant steel. Since the primary goal of this project is to enhance climate resilience, we kindly request

that the next filing provide insights into the climate projection inputs and the results of how the Climate Resilient Design Standards (CRDS) Tool influenced the project design.

We also urge the applicant to describe mitigation measures related to potential habitat loss for the Long-Eared Brown Bat, a keystone species crucial for maintaining ecological balance. Preserving bat habitats is essential for biodiversity and public health, as bats are vital in controlling insect populations, including disease-carrying mosquitoes. Implementing strategies to mitigate habitat loss, such as installing bat boxes or preserving alternative roosting sites, would help support the protection of this important species while minimizing potential human-bat interactions.

Lastly, we appreciate the project's efforts to minimize environmental impacts, particularly within Environmental Justice communities. Using existing Right-of-way to minimize adverse environmental impacts is commendable, and we encourage continued adherence to best practices to mitigate environmental effects.

NMCOG supports the objectives of the Sandy Pond to Tewksbury Reliability Project and urges the information requests and issues outlined above to be addressed in the next MEPA filing. We appreciate the opportunity to provide input on this project and respectfully request that our feedback be incorporated into any communications or certificates issued.

Sincerely,


Jennifer Raitt
Executive Director

cc: Jayne Wellman, Tewksbury Select Board and NMCOG Chair
Paul Cohen, Chelmsford Town Manager
John Curran, Billerica Town Manager
Kristen Las, Westford Town Manager
Richard Montuori, Tewksbury Town Manager