



**Franklin Regional
Council of Governments**

June 24, 2024

Gretchen Kershaw
Senior Advisor, Transmission
Grid Deployment Office
U.S. Department of Energy

RE: National Interest Electric Transmission Corridor (NIETC) Designation Process Phase 2 Comments on New York – New England Corridor

Dear Gretchen,

First, thank you and your team for taking time to speak to my colleague, Tom Matuszko, and I about the NIETC corridor designation process and specifically about the proposed New York – New England Corridor.

The Franklin Regional Council of Governments (FRCOG) serves and represents the 26 municipalities of Franklin County, Massachusetts, which is the most rural county in Massachusetts. Our region is home to forests, farms and many natural resource-based small businesses. Our communities and their municipal governments are small with limited professional capacity. The New York – New England corridor proposes to travel through eight (8) Franklin County municipalities: Ashfield, Conway, Deerfield, Erving, Greenfield, Montague, Northfield and Shelburne.

We recognize that DOE has determined that the lack of adequate electric transmission is harming our regional consumers. We know that western Massachusetts has among the highest consumer electricity rates in Massachusetts and assume that is part of the reason for identifying the corridor. If the New York – New England corridor is established, it must serve the residents of western Massachusetts directly to reduce high electricity rates. We are not supportive of the establishment of the corridor if there is no direct and tangible benefit to our region and is simply a transmission of electricity to New York.

We are concerned about the impact of the corridor on our region's small businesses and our natural resources. A mile wide corridor will have a significant impact on our region, e.g., the corridor contains 4,000 acres of endangered species habitat; 5,800 acres of prime farmland soil and/or soils of statewide importance; 950 acres of aquifers; and 3,500 acres of permanently protected land. Specifically, resources that should be protected and avoided include: active farms, such as the orchards of Clarkdale Fruit Farm in Deerfield, the Cranston's Christmas Tree Farm in Ashfield, the fertile fields of

the Yazwinski Farm in Deerfield, among others; and the 99 buildings, structures and objects identified by the Massachusetts Historical Commission.

We strongly encourage a corridor width that is significantly less than one mile and that is confined to the right of way of the already existing transmission line corridor. Eversource, the owner of the energy transmission line in this corridor, confirms that they can make the necessary improvements to enhance the resilience and capacity of this corridor within their existing right of way. In Eversource's comments to DOE they state:

While Eversource appreciates the Department's preliminary, potential listing of the New York to New England corridor, Eversource urges the Department to reconsider the corridor's width. As described in Eversource's February information submission, the existing right-of-way (ROW) in Massachusetts is several hundred feet wide, with sufficient scope and size to accommodate a new 345kV transmission project. In many of the attached resource reports, the analysis area is limited to 100 feet within the existing overhead transmission ROW. The Department's establishment of a mile-wide corridor is both unnecessary for the development of a transmission project in Eversource's ROW and concerning for the host communities through which the corridor traverses. Eversource respectfully requests the Department (i) narrow the corridor width to the existing overhead transmission ROW and transportation corridor, and (ii) clarify the reduced corridor width to the public. Community acceptance is critical for any interregional infrastructure project and narrowing the width of the corridor will go a long way in assuaging community concerns.

We believe the Franklin County communities in this corridor will be amenable to improvements within the existing right of way and that are advanced in such a way as being sensitive to the delicate environmental conditions and small business concerns that are present.

If the New York – New England corridor proceeds to Phase 3, we strongly recommend a robust public engagement process that will clearly inform communities about this process and describe the ways community members can provide input. The following are ways we recommend to conduct outreach.

- Directly communicate with local, regional and state officials representing the eight Franklin County municipalities. *
- Directly communicate with environmental and natural resource groups, such as the Woodlands Partnership of Northwestern Massachusetts and the Franklin Land Trust. *
- Directly communicate with business groups, such as the Franklin County Chamber of Commerce and Community Involved in Sustaining Agriculture. *

- Directly communicate with local media, such as The Greenfield Recorder newspaper and New England Public Media. *
- Conduct an in-person or hybrid in-person/virtual meeting for the public. Spaces at Greenfield Community College or the John W. Olver Transit Center are available to hold such meetings.
- Create a webpage on the DOE website that has information specific to the New England-New York Corridor and that includes an email address to provide input.

**A list of contact information is provided.*

Thank you for your consideration of concerns and recommendations. We look forward to hearing more about this process. If there are questions or comments, or if further information is needed to support public engagement, please contact me at lindad@frcog.org or 413-774-3167 x103.

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Dunlavy".

Linda Dunlavy

Executive Director

NIETC New York - New England Corridor Phase 3 Public Engagement Contact List for Franklin County, MA

Organization	Name	Title	Email
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Town of Erving	Bryan Smith	Town Administrator	admin.bryan.smith@erving-ma.org
City of Greenfield	Ginny Desorgher	Mayor	mayor@greenfield-ma.gov
City of Greenfield	Eric Twarog	Planning Director	EricT@greenfield-ma.gov
City of Greenfield	Amy Cahillane	Community and Economic Development Director	Amy.Cahillane@greenfield-ma.gov
City of Greenfield	Keith Barnicle	Mayor Chief of Staff	keith.barnicle@greenfield-ma.gov
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Town of Northfield	Leslie Roberts	Grant Development Director	GrantDevelopmentDirector@NorthfieldMA.gov
Town of Shelburne	Terry Narkewicz	Town Administrator	townadmin@townofshelburne.ma.gov
Franklin Land Trust	Mary Lynn Sabourin	Executive Director	mlsabourin@franklinlandtrust.org
Woodlands Partnership of Western Mass	Kate Conlin	Woodlands Partnership Coordinator	kconlin@newenglandforestry.org
Woodlands Partnership of Western Mass	Lisa Hayden	NEFF Director of Outreach & Engagement	lhayden@newenglandforestry.org
Connecticut River Conservancy	Rebecca Todd	Executive Director	rtodd@ctriver.org,
Deerfield River Watershed	Jim Perry	President	drwa@deerfieldriver.org
Franklin County Conservation District	Meghan Siudzinski	Administrative Coordinator	franklinmaconservationdistrict@gmail.com
The Trustees of Reservations	Katie Theoharides	Executive Director	info@thetrustees.org
Community Involved in Sustaining Agriculture	Phil Korman	Executive Director	phil@buylocalfood.org
Greening Greenfield			info@greeninggreenfieldma.org
Franklin County Community Development Corporation	John Waite	Executive Director	johnw@fccdc.org
Franklin County Chamber of Commerce	Jessye Dean	Executive Director	jd@franklincc.org
Greenfield Business Association	Hannah Rechtschaffen	GBA Coordinator	gba.4greenfield@gmail.com

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Cranston's Christmas Tree Farm	Seth and Jonathan Cranston	Owners	cranstonstreefarm@gmail.com
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New England Public Media			news@nepm.org