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April 15, 2016

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
SINGLE ENVIRONMENTAL IMPACT REPORT

PROJECT NAME	: Mid-Cape Main Replacement Project
PROJECT MUNICIPALITY	: Yarmouth, Dennis, Harwich, and Brewster
PROJECT WATERSHED	: Cape Cod
EEA NUMBER	: 15445
PROJECT PROPONENT	: Colonial Gas Company d/b/a National Grid
DATE NOTICED IN MONITOR	: March 9, 2016

Pursuant to the Massachusetts Environmental Policy Act (MEPA; M.G.L. c. 30, ss. 61-62I) and Section 11.08 of the MEPA regulations (301 CMR 11.00), I have reviewed the Single Environmental Impact Report (Single EIR) and hereby determine that it **adequately and properly complies** with MEPA and its implementing regulations.

This project is proposed to address safety, reliability and resiliency of critical energy infrastructure. National Grid has identified this project as a priority to meet its obligation to provide safe, reliable, and least-cost gas service to its customers. Cape Cod communities and businesses support the project and the lifting of the temporary service moratorium on new natural gas connections and expanded service. In addition, the Cape Cod Commission (CCC) has indicated its support for expediting the permitting and construction of this critical infrastructure.

Project Description

National Grid provides natural gas to approximately 112,000 customers in 13 communities on Cape Cod. The Cape Cod natural gas distribution system consists of a total of 2,565 miles of gas main. The majority of the system is operated at low operating pressures (i.e. 60 pounds per square inch gauge (psig)). A relatively small portion of the system is operated at

higher pressures (i.e. 35 miles at 270 psig and 53 miles at 200 psig). The communities of Yarmouth, Dennis, Harwich, Brewster, Chatham, Orleans and Eastham are served by the 200-psig system. National Grid has indicated demand for natural gas will grow by approximately 15 percent over the next five years at an average annual rate of three percent.

As described in the Expanded Environmental Notification Form (EENF), the project consists of the replacement of approximately 18.1 miles of the 200-psig system in Yarmouth, Dennis, Harwich, and Brewster. Approximately 17.9 miles of replacement pipe will consist of 12-inch diameter coated steel (CS) pipe. At the western limits of the project, which is the beginning of the 200-psig system in this region of Cape Cod, the project will replace the existing 12-inch diameter pipe, between Regulator Station #3920 at the South Yarmouth Liquid Natural Gas (LNG) facility and two parallel mains on Whites Path, with approximately 1,000 feet of 20-inch diameter CS pipe. This larger diameter main will allow increased flow into the existing 12-inch Middle Segment[1] main in Whites Path and the proposed parallel 12-inch replacement main.

The project will be designed and tested for 270 psig, with normal operation at 200 psig. The EENF indicates that testing the replacement main for this higher pressure will facilitate future capacity increases of the main, in the event an increase should be warranted, and will be less costly if performed at the time of project construction. The EENF indicates that National Grid does not plan to use the increased capacity that the project will provide. It will continue to operate the main at 200 psig.

The uniform 12-inch pipe along the majority of the route will allow more efficient in-line inspections to maintain system integrity. National Grid's policies require the replacement main to be "piggable" (i.e. designed for in-line inspections) and pipeline construction standards recommend consistent diameters along new mains. Upon project completion, the majority of the existing main will be decommissioned and abandoned in place; however, four short sections of the existing main (11,445 linear feet (lf)) will continue operation at a reduced pressure of 60 psig in order to eliminate existing high pressure services or "farm taps".[2]

The project will be installed along the same route as the existing main, with the majority under pavement and no portion greater than ten feet off the paved surface. The majority of the project will also be installed within three feet of the existing main; some sections will be installed across the street and parallel to the existing main. The proposed route will begin in Yarmouth and pass through Dennis and into Harwich before splitting and extending north into Brewster and further east across Harwich where the end of the route has a southern spur. The project includes the following segments:

1. Yarmouth-Dennis Segment (4.9 miles): replace 4.9 miles of ten-inch main with a combination of 20-inch and 12-inch main;
2. Harwich Segment (8.0-8.1 miles): replace 4.8 miles of eight-inch main, 1.6 miles of six-inch main, and 1.6 miles of six-inch and eight-inch main, with 12-inch main; and

[1] The Middle Segment was previously reviewed by the MEPA Office as part of the KeySpan Sagamore Line Reinforcement Project (SLRP, EEA #13543).
[2] Farm taps are pipeline facilities which supply service lines to individual homes and businesses via high-pressure services on the 200-psig main rather than from a separate 60-psig distribution line (typical).

3. Brewster Segment (5.2 miles): replace 5.2 miles of ten-inch main with 12-inch main.

The proposed route will include crossings of water bodies, culverts, and State roads. The project will cross water bodies and drainage features such as culverts on existing bridges or within the existing roadbed, and State roads using trenchless crossing techniques such as jack-and-bore or horizontal directional drilling (HDD) to avoid construction impacts on those roads. The project will require withdrawal of approximately 572,960 gallons of water from an undetermined municipal source for a hydrostatic test of the assembled pipeline. The project will include three construction phases, which may run concurrently.

Land uses within and adjacent to the project right-of-way (ROW) include forested areas, wetlands, open space, roadways, electric transmission corridors, and a mix of residential and commercial/industrial areas. The route will pass over State roadways and several local roadways. The route crosses the Bass River, Herring Brook, and several other perennial and intermittent streams. The project corridor extends through areas identified by the Division of Fisheries and Wildlife Natural Heritage and Endangered Species Program (NHESP) as *Priority* and *Estimated Habitat* for rare species. Historical and archaeological resources have been documented within or adjacent to the project ROW. The project corridor includes sites which are regulated under the Massachusetts Contingency Plan (MCP).

Project Background

The EENF indicates that the project is proposed to provide safe, reliable, and cost-efficient natural gas service to its customers. National Grid discovered a substandard condition on a service connected to the existing 200-psig distribution main in early 2014 and initiated an investigation and inspection program to review construction of the 200-psig system in Yarmouth, Dennis, Brewster, and Harwich. National Grid was required to reduce the pressure in the 200-psig system to an operating pressure of less than 125-psig in mid-2014 to ensure public safety. This lower operating pressure reduces the volume of natural gas that National Grid can supply under high-demand conditions. Consequently, National Grid instituted a moratorium on new and expanded gas services (including conversions) on portions of the mid-Cape and all of the lower Cape Cod regions. As a result of the inspections, National Grid also determined that approximately 18.1 miles of the 200-psig system required replacement.

Jurisdiction and Permitting

The project is undergoing MEPA review and is subject to a mandatory EIR pursuant to 301 CMR 11.03(7)(a)(3) of the MEPA regulations because it requires State Agency Actions and involves construction of a new fuel pipeline ten or more miles in length. The project will require a Chapter 91 (c. 91) Minor Project Modification from the Massachusetts Department of Environmental Protection (MassDEP), an Access Permit from the Massachusetts Department of Transportation (MassDOT), and an Approval of Petition to Construct (M.G.L c. 164, s. 69J) from the Energy Facilities Siting Board (EFSB). The project is subject to review under the May 2010 MEPA Greenhouse Gas (GHG) Emissions Policy and Protocol (GHG Policy).

The project also requires Negative Determinations of Applicability or Orders of Conditions from the Yarmouth, Dennis, Harwich, and Brewster Conservation Commissions (under local wetlands regulations only), a National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) from the United States Environmental Protection Agency (EPA), review by the Massachusetts Historical Commission (MHC) pursuant to M.G.L. c.9, ss.26-27C (950 CMR 70-71) and Development of Regional Impact (DRI) review from the Cape Cod Commission (CCC).

The project is not receiving Financial Assistance from the Commonwealth. Therefore, MEPA jurisdiction is limited to those aspects of the project that are within the subject matter of required or potentially required State Agency Actions and that may cause Damage to the Environment, as defined in the MEPA regulations. Because the project requires review and approval by the EFSB, subject matter jurisdiction is functionally equivalent to broad scope jurisdiction, in accordance with 301 CMR 11.01(2)(a)(3). Therefore, MEPA jurisdiction for this project extends to all aspects of the project that are likely, directly or indirectly, to cause Damage to the Environment as defined in the MEPA regulations.

Environmental Impacts and Mitigation

Potential impacts are primarily associated with the construction period and include temporary impacts to 5,510 square feet (sf) of Riverfront Area, a one-time withdrawal of 572,960 gallons of water for hydrostatic testing of the pipeline, and traffic impacts. The project will not affect properties listed on the State and National Register, nor will it affect historic districts or properties/areas listed on the Inventory of Historic and Archaeological Assets of the Commonwealth. Measures to avoid, minimize, and mitigate project impacts include confining the project to the existing roadway layout to avoid alteration of new land and creation of new impervious area; avoidance of adjacent wetland resource areas; installation of erosion and stormwater best management practices (BMPs); GHG mitigation measures; and development of a Traffic Management Plan (TMP).

Review of the Single EIR

The Single EIR includes a description of the project and updated plans. It identifies minor changes to the project since filing the EENF. The Single EIR provides a description and analysis of applicable statutory and regulatory standards and requirements, and a description of how the project will meet those standards. It includes a list of required State Agency Permits as well as local and federal permitting. It responds to comments received on the EENF, provides additional information on traffic and GHG emissions, identifies and commits to specific environmental mitigation measures, and provides revised draft Section 61 Findings.

Proposed changes to the project since filing the EENF include:

- National Grid will consult with MassDOT to determine whether open cut trenching may have less impacts than the proposed trenchless crossing technique at the intersection of Depot Road/Route 28 in Harwich;

- Subsequent to consultation with the Town of Dennis, the project will eliminate trenchless crossing at the intersection of Upper County Road/Great Western Way;
- A maximum of four remotely-controlled isolation valves will be installed within the roadway layout within 10 feet of pavement.

Wetlands, Waterways, and Stormwater

The Yarmouth, Dennis, Harwich, and Brewster Conservation Commissions will review the project to determine its consistency with local wetlands bylaws, regulations, and codes. MassDEP will also review the project for consistency with the c. 91 Waterways Regulations (310 CMR 9.00). The EENF indicated that the proposed replacement project is exempt from WPA review as a minor activity pursuant to 310 CMR 10.02(2)(b)2(i). The Proponent consulted with MassDEP regarding applicability of exemptions to the WPA. Comments from MassDEP indicate that the Single EIR addresses its concerns related to work within Land Subject to Coastal Storm Flowage (LSCSF) and the minor exempt activity status of the project.

Project construction will be limited to existing public roadway layouts, and will not permanently impact wetlands or waterways. Because the route extends adjacent to or over wetlands and waterways, the project will be sited within the 100-foot buffer zone to wetland resource areas, mapped floodplains, and the 200-foot Riverfront Area. The project will temporarily impact 5,510 sf of previously developed Riverfront Area and 21,653 sf of buffer zone. It will extend through approximately 250 lf of LSCSF, but will not alter this resource area. Six vernal pools are located within 300 feet of the project route. The project will include five water crossings, which would occur over culverts, with the exception of Bass River, where the replacement main will be installed within an existing utility bay beneath the Highbank Road Bridge. The stream crossings will be constructed through open-cut trench in the road bed above existing culverts.

National Grid has indicated that the minor activities exemption (310 CMR 10.02(2)(b)2(i)) also applies to certain construction within Riverfront Area pursuant to 310 CMR 10.58(6)(b). Therefore, under 310 CMR 10.02(2)(b)2(i) the work within Riverfront Area would not be subject to the performance standards in 310 CMR 10.58(5) because it involves installation of a natural gas main beneath existing paved roadways where trenches for construction will be closed at the end of each work day and it will be performed in accordance with the criteria in 310 CMR 10.02(2)(b)2(i).

The project will cross flowed and filled tidelands of the Bass River which is subject to c. 91 jurisdiction. The project will also cross several other non-tidal rivers and streams. MassDEP comments on the EENF noted that two of these, Herring River and Stony Brook are jurisdictional waterways. MassDEP comments on the EENF also indicated that these crossings could be authorized as Minor Project Modifications of existing c. 91 Licenses. National Grid consulted MassDEP regarding the Herring River and Stony Brook crossings and provided additional information to assist MassDEP in determining if c. 91 authorizations would be required.

The project will not create new impervious area. Following construction, the project will not have any stormwater-related impacts and will not alter the existing stormwater drainage or management along the route. The project will install and maintain erosion and sedimentation BMPs to protect wetland resource areas and other sensitive areas. The project will prepare a Stormwater Pollution Prevention Plan (SWPPP) in compliance with the NPDES CGP. The project will provide spill protection technology where needed.

Public Benefits Determination

Consistent with the provisions of *An Act Relative to Licensing Requirements for Certain Tidelands* (2007 Mass. Acts c. 168, sec.8) (the Act), which was enacted on November 15, 2007, I *must* conduct a Public Benefit Review for projects in tidelands that are required to file an EIR. The project exceeds EIR thresholds at 301 CMR 11.03 and the project site contains waterways or tidelands subject to c. 91. The Single EIR identifies elements of the project located within flowed and filled tidelands associated with the Bass River, Herring River, and Stony Brook. The Single EIR indicates that the project is an "Infrastructure Crossing Facility", defined in the Waterways Regulations at 310 CMR 9.02, and because it cannot be located away from tidelands to meet the project purpose, it is classified as a water-dependent use pursuant to 310 CMR 9.12(2)(d). The Single EIR also provides a public benefits analysis of the project consistent with the provisions of the Act. I concur that the project is a water-dependent use. Pursuant to the Public Benefit Determination (PBD) regulations at 301 CMR 13.04(1), the project is presumed to provide adequate public benefit because it is a water-dependent use. Therefore, I am declining to issue a separate PBD for this project.

Traffic and Transportation

The project will require an Access Permit from MassDOT for proposed work within the State highway layout. The project will cross Route 28 (Main Street) and Depot Road along the Harwich segment and Route 6 and Depot Street along the Brewster segment. The pipeline will cross underneath Route 6 on Depot Street and, therefore, no work on Route 6 will be required.

The Proponent will work closely with MassDOT and municipalities to develop a Traffic Management Plan (TMP) to maintain safe and efficient access for all modes of travel along the project route. It will include: width and lane locations within the work zone; work schedule and duration of lane/road closures, or detours; traffic-control devices; locations where temporary provisions may be made to maintain access to homes/businesses; routing and protection of pedestrian/bicycle traffic; maintenance of school bus service; determination of the impact to roadway level of service (LOS) due to lane closures; communication with the public, municipal officials, and businesses; and coordination with police and fire departments. Review and approval of the TMP will occur during MassDOT permitting.

The Single EIR includes a map that identifies the locations of six at-grade crossings at State highway intersections that will be impacted by the project. The only State-controlled route with an at-grade crossing is at the intersection of Route 28/Depot Street in Harwich. The Proponent is considering a trenchless crossing technique at this intersection; however, due to

space constraints in this area, National Grid is working with MassDOT to determine whether open cut trenching could reduce impacts.

Greenhouse Gas Emissions

This project is subject to review under the May 5, 2010 MEPA GHG Policy. The GHG Policy is one element of a comprehensive effort to meet the Commonwealth's obligations under the Global Warming Solutions Act (GWSA) which include reducing carbon emissions by between 10 percent and 25 percent below 1990 emissions levels by the year 2020, and by 80 percent below 1990 emissions levels by the year 2050. Consistent with MEPA's overall purpose to evaluate alternatives that avoid, minimize and mitigate environmental impacts to the maximum extent practicable (301 CMR 11.01), the Policy requires that GHG impacts of projects have been carefully considered and that all feasible means and measures to reduce those impacts are adopted. The Policy requires that all projects that are subject to preparation of an EIR quantify GHG emissions, evaluate measures that could reduce GHG emissions and quantify potential reductions of mitigation measures. This is a case-by-case inquiry that allows project proponents to select mitigation measures that are determined to be feasible for the particular project being proposed, thereby providing project proponents with maximum flexibility to design their projects. The Proponent consulted with the MEPA Office and DOER regarding the GHG analysis on January 25, 2016.

Independent of the GHG Policy, National Grid has a corporate Environmental Policy, which states that it will reduce the impact of its business on global climate change by targeting a decrease in emissions of GHG by 45 percent by 2020 and 80 percent by 2050 from 1990 baselines emission levels. It includes consideration of mitigation and adaptation measures to reduce the impact of climate change on its business by implementing. The Single EIR supplemented the GHG analysis from the EENF through inclusion of revised calculations and additional description and analysis of the GHG impacts associated with operation of the pipeline.

The Single EIR addresses how the pipeline is designed to avoid and minimize natural gas leakage of the distribution system. The pipeline will have 100 percent welded connections, with no mechanical connections that would allow the potential for leaks. All of the welds will be visually detected and non-destructively tested. The line will be hydrostatically tested to establish the maximum allowable operating pressure (MAOP) and ensure its integrity. External coatings systems on the pipe and a galvanic anode cathodic protection system will provide protection from corrosion. The Single EIR indicates that there have been three leaks on the existing 200-psig Mid-Cape System in the past 16 years (excluding leaks caused by third party damage).

The Scope directed the Proponent to compare fugitive emission rates for the existing and proposed pipeline. The Single EIR indicates that there would be no significant difference between the existing system and the proposed system with respect to GHG emissions. The proposed pipe and fittings, material properties, manufacturing process, coating process, and cathodic protection system would be consistent with the existing system. EPA emission factors are employed to estimate fugitive emissions from the project; calculated emissions would be the same for the existing and proposed systems because the design will remain the same for all relevant parameters. The EPA emission factor for CS pipe and associated fittings is 0.35 standard

cubic feet (scf) per hour per mile. The projected natural gas leak emissions rate for the 18.1 miles of main will be 55.5 thousand cubic feet (mcf) per year, which is equivalent to 29.1 tons per year (tpy) of carbon dioxide equivalent (CO_2e). This emission rate calculation is the same for the existing system and the proposed system. The additional length of existing main that will be continued in use at 60 psig will have an estimated emission rate of 6.65 mcf/year, which is equivalent to 3.5 tpy of CO_2e.

The Single EIR provides a discussion on federal and State natural gas leak classification standards and requirements. It also describes National Grid's leak classification procedures which is consistent with industry standards and is based on distance from structure, surface strata, and amount of gas readings. National Grid has an existing procedure for leakage survey and patrolling. The project will require the main to be patrolled four times annually. A mobile leak survey must be performed at least once per calendar year.

The Single EIR indicates that National Grid collaborated with EPA to develop the EPA Natural Gas STAR program through the American Gas Association, Downstream Initiative, and ONE Future. The Methane Challenge has not yet been finalized; however, National Grid will participate in the program and is committed to leading industry efforts to reduce methane emissions.

Construction Period Impacts

The Proponent will consult with local agencies and its contractor to develop an Environmental Construction Plan (ECP) that will address in detail the implementation of environmental protection measures during construction staging, materials delivery, and installation of the replacement main. The ECP will be adaptive and subject to revision to allow for changes in construction sequencing. The Proponent will engage the services of a qualified Environmental Inspector to manage the environmental inspection program, ensure that the contractor complies with the ECP, and ensure that construction activities will comply with conditions of all permits and approvals.

National Grid will comply with the requirements of MassDEP's Diesel Retrofit Program. All diesel-powered non-road construction equipment with engine horsepower ratings of 50 and above (used for more than 30 days) will either be EPA Tier 4-compliant or will have EPA-verified (or equivalent) emission control devices such as oxidation catalysts or other comparable technologies installed on the exhaust system. National Grid will limit idling time to five minutes.

The Single EIR provides additional information regarding the project's generation, handling, recycling, and disposal of construction and demolition debris. It identifies specific materials and the management strategy (recycling and reuse) for each in accordance with National Grid's Environmental Policy.

Mitigation and Section 61 Findings

The Single EIR listed the Proponent's mitigation commitments and provided draft Section 61 Findings for each State Agency that will issue permits for the project. In order to

ensure that all GHG emissions reduction measures adopted by the Proponent or the developer as the Preferred Alternative are effectuated, the Single EIR includes a commitment to submit a self-certification to the MEPA Office at the completion and commissioning of each building that will be signed by an appropriate professional (e.g. engineer, architect, transportation planner, general contractor) indicating that all of the required GHG mitigation measures, or equivalent measures that are designed to collectively achieve identified reductions in stationary source GHG emission, as well as transportation-related measures have been incorporated into the project.

GHG Emissions

- Minimize tie-in venting natural gas releases through design and planning with strategic placement of valves to minimize the length of pipe required to vent to facilitate a connection.
- Minimize decommissioning natural gas releases by: using a drawdown compressor to bleed down and evacuate natural gas from the 200-psig main after it is sectioned off/isolated from the rest of the system; injecting gas from the existing main into the adjacent 60-psig distribution system; and flaring to further draw down pressure in the main to atmospheric pressure.
- Reduce replacement main valve pressure when possible prior to performing maintenance activities to minimize venting of gas to the atmosphere.
- Minimize extent of fugitive emissions through pipe integrity including: cathodic protection to minimize corrosion; periodic inspections; use of a gas odorant for rapid recognition of a leak; and maintenance of readily available leak equipment.

Wetlands

- Avoid and minimize impacts to wetland resource areas from erosion and sedimentation through the preparation of a SWPPP that will include use of an Environmental Monitor to ensure compliance with all environmental permits; placement of erosion and sedimentation controls; and closing trenches at the end of each work day.

Construction

- Environmental Monitor will manage the environmental inspection program.
- Comply with MassDEP's Diesel Retrofit Program and use of the ULSD in off-road engines.
- Work with municipalities to develop a comprehensive TMP.
- Adherence to air quality mitigation measures such as limiting engine idling times to five minutes except when delivering materials or operating accessories such as power lifts, minimizing stockpiling, and mechanical street sweeping.
- Adherence to noise mitigation measures such as working during typical construction hours, use of appropriate mufflers, and use of shielding/buffering distance.

Conclusion

The Single EIR has provided sufficient information for the purpose of MEPA review and includes commitments to avoid, minimize, and mitigate environmental impacts. Any outstanding issues can be addressed during State, federal, and local permitting and review. Based on a review of the Single EIR, comment letters and consultation with State Agencies, I find that the Single EIR adequately and properly complies with MEPA and its implementing regulations. The project may proceed to permitting. The Proponent and State Agencies should forward copies of the final Section 61 Findings to the MEPA Office for publication in accordance with 301 CMR 11.12.

The Single EIR does not address environmental impacts associated with the potential increase in capacity that would be supported by the project. National Grid will operate the system at 200 psig and has indicated that it does not intend to increase supply. As noted previously, prior to any increase in the project's operating pressure to increase supply of natural gas, National Grid would be required to develop a formal up-rating plan for review by DPU. If National Grid proposes to increase supply, it should consult with the MEPA Office to determine if further MEPA review would be warranted in the form of a Notice of Project Change (NPC).

April 15, 2016
Date

Matthew A. Beaton

Comments received:

03/11/2016	Massachusetts Department of Environmental Protection (MassDEP)/ Southeast Regional Office (SERO)
04/01/2016	Massachusetts Division of Marine Fisheries (DMF)
04/07/2016	Cape Cod Commission (CCC)

MAB/PPP/ppp

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Martin Suuberg
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March 11, 2015

Mathew A. Beaton,
Secretary of Environment and Energy
Executive Office of Environmental Affairs
ATTN: MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: SEIR Review EOEEA # 15445 - YARMOUTH, DENNIS, HARWICH, BREWSTER. Mid-Cape Main Replacement Project, 18.1 miles in Yarmouth Dennis Harwich Brewster

Dear Secretary Beaton,

The Southeast Regional Office of the Department of Environmental Protection (MassDEP) has reviewed the Supplemental Environmental Impact Report (SEIR) for the proposed Mid-Cape Main Replacement Project, 18.1 miles in Yarmouth Dennis Harwich Brewster (EOEEA # 15445). The project proponent provides the following information for the project:

The company proposes to replace approximately 18.1 miles of its existing 200-psig natural gas distribution system in the Towns of Yarmouth, Dennis, Harwich, and Brewster. Approximately 17.9 miles of the replacement main will be nes 12-inch-diameter CS pipe.

At the westernmost end, beginning location of the Project, which is the very beginning of the 200-psig system on this part of the Cape. Approximately 1,000 feet of 20-inch-diameter CS pipe will be used to replace the existing single 12-inch-diameter pipe between the Company's Regulator Station #3920 at the South Yarmouth LNG facility and two parallel mains on White's Path. Use of this short segment of larger-diameter main will allow increased flow into the existing 12-inch "Middle Segment" main in White's Path and the parallel 12-ich replacement main (to be constructed).

The project consists of the following segments: (1) Yarmouth-Dennis Segment (4.9 miles) of 10-inch CS (200 psig) with a combination of 20 and 12-inch mains; (2) Harwich Segment (~8.0-8.1 miles) and (3) Brewster Segment (5.2 miles). The proposed route will have a number of "special crossings" of features such as water bodies, culverts, and state roads. Crossings of water bodies and drainage features (e.g. culverts) will be accomplished on existing bridges or within the existing roadbed. Crossings of state roads will be accomplished using trenchless crossing techniques such as jack-and-bore or horizontal directional drilling ("HDD") to avoid construction impacts on those roads.

Wetlands and Waterways

The Wetlands Program has reviewed the SEIR and finds that the project proponent, on Pages 4-11 & 4-12 of the response to comments (DEP-01), has satisfactorily addressed the Program's concerns

related to the work within Land Subject to Coastal Storm Flowage and the minor exempt activity status of the project.

Bureau of Waste Site Cleanup
Based upon the information provided, the Bureau of Waste Site Cleanup (BWSC) searched its databases for disposal sites and release notifications that have occurred at or might impact the proposed project area. A disposal site is a location where there has been a release to the environment of oil and/or hazardous material that is regulated under M.G.L. c. 21E, and the Massachusetts Contingency Plan [MCP – 310 CMR 40.0000].

The proposed project involves replacement of approximately eighteen miles of gas pipeline. Please be advised that there are many listed BWSC disposal sites located within the proposed project area. Many of the sites have closed under the MCP, but many other disposal sites are open and require continued response actions under the MCP. A listing and discussion of each MCP site will not be presented here.

Interested parties are encouraged to view a map showing the location of BWSC disposal sites using the MassGIS data viewer (Oliver) at: http://maps.massgis.state.ma.us/map_ol/oliver.php Under "Available Data Layers" select "Regulated Areas", and then "DEP Tier Classified 21E Sites". The compliance status and report submittals for specific MCP disposal sites may be viewed using the BWSC Waste Sites/Reportable Release Lookup at:
http://public.dep.state.ma.us/SearchableSites2/Search.aspx

The Project Proponent is advised that if oil and/or hazardous materials are identified during the implementation of this project, notification pursuant to the Massachusetts Contingency Plan (310 CMR 40.0000) may be necessary. A Licensed Site Professional (LSP) should be retained to determine if notification is required, and render appropriate opinions as necessary. The LSP may evaluate whether risk reduction measures are necessary if contamination is present. Please contact BWSC for guidance if questions arise regarding assessment and cleanup under the MCP.

Construction Stormwater Permit
The project construction activities are scheduled to disturb 2.98 acres of land and therefore, may require a NPDES Stormwater Permit for Construction Activities. The proponent can access information regarding the NPDES Stormwater requirements and an application for the Construction General Permit at the EPA website: http://cfpub.epa.gov/npdes/stormwater/cgp.cfm

Air Quality
Construction and operation activities shall not cause or contribute to a condition of air pollution due to dust, odor or noise. To determine the appropriate requirements please refer to:
310 CMR 7.09 Dust, Odor, Construction, and Demolition
310 CMR 7.10 Noise

Proposed s.61 Findings
The "Certificate of the Secretary of Energy and Environmental Affairs on the Environmental Notification Form" may indicate that this project requires further MEPA review and the preparation of an Environmental Impact Report. Pursuant to MEPA Regulations 301 CMR 11.12(5)(d), the Proponent will prepare Proposed Section 61 Findings to be included in the EIR in a separate chapter updating and summarizing proposed mitigation measures. In accordance with 301 CMR

11.07(6)(k), this chapter should also include separate updated draft Section 61 Findings for each State agency that will issue permits for the project. The draft Section 61 Findings should contain clear commitments to implement mitigation measures, estimate the individual costs of each proposed measure, identify the parties responsible for implementation, and contain a schedule for implementation.

Very truly yours,

Jonathan E. Hobill,
Regional Engineer,
Bureau of Water Resources

JH/GZ

Cc: DEP/SERO

ATTN: Millie Garcia-Serrano, Regional Director
David Johnston, Deputy Regional Director, BWR
Maria Pinaud, Deputy Regional Director, BAW
Gerard Martin, Acting Deputy Regional Director, BWSC
Jennifer Viveiros, Deputy Regional Director, ADMIN
Jim Mahala, Chief, Wetlands and Waterways
Dan Gilmore, Wetlands Program
Allen Hemberger, Site Management

Patel, Purvi (EEA)

From: Petitpas, Christian (FWE)
Sent: Friday, April 01, 2016 1:49 PM
To: Patel, Purvi (EEA)
Cc: 'hcarlson@epsilonassociates.com'; 'Erin Burnham'; 'Harwich Conservation Commission'; 'Harwich Conservation Commission'; 'Brewster Conservation Commission'; 'Grant, Kelly'; Ford, Kathryn (FWE); Lehan, Richard (FWE)
Subject: EEA# 15445 SEIR, Colonial Gas Company

Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Purvi Patel, EEA No. 15445
100 Cambridge Street, Suite 900
Boston, MA 02114

Dear Secretary Beaton:

The Division of Marine Fisheries (*MarineFisheries*) has reviewed the Single Environmental Impact Report (SEIR) by Colonial Gas Company for the proposed multi-stage Mid-Cape Main Replacement Project involving the replacement of 18.1 miles of existing 200-psig natural gas distribution main system in the Towns of Yarmouth, Dennis, Harwich, and Brewster. The project SEIR was reviewed with respect to potential impacts to marine fisheries resources and habitat.

Based on the scope of work as currently proposed, *MarineFisheries* has no recommendations for sequencing, timing, or methods that would avoid or minimize impact at this time.

Questions regarding this review may be directed to John Logan in our New Bedford office at 508-990-2860 ext. 141.

Sent on behalf of John Logan

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CAPE COD
COMMISSION

By Electronic Mail

April 8, 2016

Matthew A. Beaton, Secretary
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office, Purvi Patel, Analyst
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: ***Single Environmental Impact Report (SEIR)- EEA No. 15445***
NGRID- Mid Cape Main Replacement Project
Towns of Harwich, Brewster, Dennis, Yarmouth
(CCC Project No. 15022)

Dear Secretary Beaton:

The Cape Cod Commission re-iterates its support for the Project articulated in its letter on the EENF, and supports the issuance of a Certificate on the SEIR that the SEIR is adequate and the Project properly complies with MEPA, subject to Section 61 findings on the Project to be included in the Certificate.

The Commission suggests that the SEIR adequately responds to and addresses general issues raised in the Commission's EENF comment letter.

In addition to other commitments by the applicant articulated in the SEIR and the EENF, when the Project moves forward to direct regulatory review by the Commission, the applicant should have prepared a construction equipment re-fueling protocol. This protocol should, among other things, recognize special water resource areas in which the Project is to occur (such as Zone 1's; Wellhead Protection Areas/ Zone 2's;proximate waterbodies, wetlands and buffer zones thereto; Potential Public Water Supply Areas identified in Barnstable County's Regional Policy Plan; and properties likely served by private wells as identified in the SEIR); corresponding safeguards to prevent releases, including within and to these special water resource areas; inclusion of a map identifying properties likely served by private wells; and emergency spill response provisions in the event that there is a release, including within and to these special water resource areas.

The applicant should also further detail in its application to the Commission erosion and sedimentation control and other environmental protection measures associated with construction, including for properties likely served by private wells as identified in the SEIR.

Thank you for the opportunity to provide comments on the above-referenced SEIR. Cape Cod Commission staff is available and happy to answer any questions about these comments.

Sincerely,

Kristy Senatori

Kristy Senatori
Deputy Director

Cc: Project File
Applicant's agent Epsilon Associates Inc. via email
Yarmouth, Dennis, Harwich and Brewster CCC Representatives via email
Yarmouth, Dennis, Harwich and Brewster Town Administrators/ Managers via USPS