

MITT ROMNEY GOVERNOR **KERRY HEALEY** LIEUTENANT GOVERNOR

STEPHEN R. PRITCHARD SECRETARY

The Commonwealth of Massachusetts Executive Office of Environmental Affairs 100 Cambridge Street, Suite 900 Boston, MA 02114-2524

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February 17, 2006

CERTIFICATE OF THE SECRETARY OF ENVIRONMENTAL AFFAIRS ON THE FINAL ENVIRONMENTAL IMPACT REPORT

PROJECT NAME

: KeySpan Sagamore Line Reinforcement Project

PROJECT MUNICIPALITY

: Sandwich, Barnstable, Yarmouth, Dennis, Harwich

PROJECT WATERSHED

: Cape Cod

EOEA NUMBER

: 13543

PROJECT PROPONENT

: Colonial Gas Company, d/b/a KeySpan Energy Delivery

New England ("KeySpan")

DATE NOTICED IN MONITOR

: January 11, 2006

As Secretary of Environmental Affairs, I hereby determine that the Final Environmental Impact Report (FEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act (G. L. c. 30, ss. 61-62H) and with its implementing regulations (301 CMR 11.00). A project change identified in the FEIR, that would affect Article 97 lands, has been withdrawn by the proponent. As further detailed below, if there is a change in the location of the pipeline and take station, a Notice of Project Change (NPC) will be required.

The proposed project involves construction of approximately 13.1 miles of new highpressure, distribution pipeline in the towns of Yarmouth, Dennis, Harwich, Sandwich and Barnstable. The pipelines will parallel and tie into the existing KeySpan system on Cape Cod. The project is composed of three segments: The western segment (6.6 miles of 20-inch diameter pipeline) begins on Service Road in Sandwich on the eastern side of Route 130 and ends west of the Route 149/Route 6 intersection in Barnstable. The middle segment is approximately 4.9 miles in length (12-inch diameter pipeline) beginning at the KeySpan LNG facility in South Yarmouth and ending at Depot Street/Main Street in Harwich. The eastern segment (1.6 miles of 12-inch diameter pipeline) begins at the Depot Road/Route 39 intersection and ends at the Church Street/Route 39 intersection in East Harwich.

The project is undergoing environmental review and requires the preparation of a mandatory EIR pursuant to Sections 11.03(7)(a)(3) of the MEPA regulations because it involves construction of a new fuel pipeline ten or more miles in length. The project is also undergoing

environmental review pursuant to Section 11.03(2)(b)(2) because it may involve a "take" of a state-listed rare species, and Section 11.03(10)(b) because it may involve destruction of a state-listed archaeological site

The project will require an Approval to Construct from the Energy Facilities Siting Board (EFSB) and a Bridge Crossing Approval from the Department of Telecommunications and Energy (DTE). The proponent will be required to submit a Development of Regional Impact (DRI) application to the Cape Cod Commission. The project will require permits to perform construction within the state highway from the MassHighway Department (MHD). The project requires a permit for a Reconnaissance Survey from the Massachusetts Historical Commission (MHC). The project may require Orders of Conditions from the Yarmouth and Dennis Conservation Commissions (and in the event of an appeal, a Superseding Order from the Department of Environmental Protection (DEP)). The project may require a Chapter 91 License from DEP. The project will require a National Pollutant Discharge Elimination System (NPDES) Construction Activities Permit from the US Environmental Protection Agency (EPA).

The project, as proposed in the FEIR, would require an Act of Legislation for disposition of Article 97 lands, an easement from the Department of Conservation and Recreation (DCR), an Access Permit from MHD for crossing Route 130, and may require a Conservation and Management Permit from the Division of Fisheries and Wildlife, Natural Heritage and Endangered Species Program (NHESP). As described below, the proposed project change that would affect Article 97 lands and require additional permits, has since been withdrawn.

The proponent is not seeking financial assistance from the Commonwealth. Therefore, MEPA jurisdiction applies to those aspects of the project within the subject matter of required state permits with the potential to cause damage to the environment. In this case, MEPA jurisdiction extends to energy, rare species, traffic, wetlands, waterways, historical and archaeological resources, and land – including Article 97 land disposition, and stormwater management.

Project Change

Since the filing of the FEIR, the proponent has withdrawn a component of the project, which was identified as a project change in the FEIR. The FEIR proposed an extension to the western segment of the pipeline that would cross Route 130 and extend approximately 190 feet into Shawme-Crowell State Forest. The proposed extension was added in order to connect with the proposed Algonquin Gas Transmission (AGT) meter and regulation station (take station). This component of the project would require an Act of Legislation because it would affect lands protected under Article 97 of the Amendments to the Constitution of the Commonwealth. The project change proposed in the FEIR would also be subject to the Massachusetts Endangered Species Act (MESA) regulations (321 CMR 10.00) and would require an Access Permit from MHD for crossing Route 130. I received a letter from the proponent, dated February 17, 2006, stating that this component of the project is being withdrawn, and that the proposed western segment of the pipeline will terminate on Service Road, on the eastern side of Route 130, as proposed in the Draft EIR.

The proponent's letter indicates that planning and coordination is on-going with AGT regarding the location of the proposed take station. If the pipeline extension into Shawme-Crowell State Forest is proposed again in the future, the proponent should submit an NPC that addresses impacts to Article 97 lands and demonstrates consistency with all the conditions of the EOEA Article 97 Land Disposition Policy. The NPC should also address rare species issues and consultations with NHESP, and the requirement for an easement from the Department of Conservation and Recreation (DCR). I expect that any subsequent MEPA filing will address the cumulative impacts associated with the proposed KeySpan project and the AGT project.

Rare Species

Portions of the project are located within designated Priority Habitat of rare species (PH 1470 and PH 1762). NHESP has determined that proposed activities in PH 1762 are exempt from the Massachusetts Endangered Species Act (MESA) regulations (321 CMR 10.00). However, as described above, the FEIR included a proposed change to the western segment of the pipeline. This proposed change, which included non-exempt activities in PH 1470 subject to MESA review, has since been withdrawn by the proponent.

The proponent has agreed to siltation fencing and other measures to protect rare species during construction activities. The proponent should continue consultations with NHESP for guidance on measures to avoid and minimize or mitigate any adverse impacts to rare species associated with the project. The proponent should provide sufficient information to the Cape Cod Commission (CCC) during DRI review to demonstrate that the project is consistent with the Regional Policy Plan standard and does not adversely affect the habitat of local populations of rare wildlife and plants.

Wetlands and Waterways

The proponent should consult with DEP to determine if a Chapter 91 License or modification of an existing license is required for the proposed Bass River crossing. The proponent should provide documentation to the CCC during DRI review that demonstrates how the project will meet DEP Chapter 91 License requirements. The preferred route for the proposed pipeline is located within wetlands resource areas at the Bass River crossing and at a culverted stream crossing on Great Western Road. The FEIR indicates that the project will avoid bordering vegetated wetlands and will occur in existing paved areas within the buffer zone. The proponent should provide detailed construction plans of the proposed wetlands crossings to the CCC as part of the DRI review and as the design of each segment is finalized.

Historic and Archaeological Resources

The Massachusetts Historical Commission (MHC) has determined that the preferred route for the middle segment is unlikely to affect any significant historic and archaeological resources, although portions of the eastern and western segments may impact historic and archaeological resources. I strongly encourage the proponent to avoid locating the pipeline in areas outside the paved town rights-of-way that are assigned a moderate to high archaeological sensitivity. If alternative pipeline routing cannot avoid archaeologically sensitive portions of the

eastern and western segments, the proponent should conduct an Intensive Archaeological (Locational) Survey in accordance with 950 CMR 70. The proponent should consult with MHC regarding the survey and any measures that may be necessary to avoid and minimize or mitigate impacts to historic and archaeological resources. The proponent has committed to consultations with the South Dennis Historic District Commission regarding proposed activities within the District. The proponent should also work with the Harwich Historical Commission to address potential impacts in the area of Union Cemetery in Harwich.

As further detailed in it's comment letter, the CCC will use the results of MHC's findings on the archaeological survey for Phase I of the middle segment to determine if the project is consistent with RPP standards related to archaeological resource protection.

Construction

The proponent should continue consultations with MHD to regarding construction and access permits. The proponent should provide a revised Environmental Construction Plan (ECP) to the Cape Cod Commission that reflects the proponent's commitments to prohibit vehicle refueling, lubrication and maintenance in the field.

Mitigation

The proponent has committed to a range of mitigation measures in the FEIR, including but not limited to:

- Preparation of detailed traffic management plans in cooperation with local officials;
- Construction vehicle emission controls;
- Best Management Practices (BMPs) to minimize noise associated with construction;
- A prohibition on refueling and maintenance of construction vehicles in the field;
- An Environmental Inspector, independent of the contractor, to report directly to the proponent;
- Implementation of an Environmental Construction Plan (ECP), which addresses environmental responsibilities and communications, construction sequencing, erosion and sediment controls, stormwater management and spill prevention, siltation fencing and surveys to protect rare species, and wetlands protection measures.

I find that the FEIR is sufficiently responsive to the requirements of the MEPA regulations and the Scope to meet the regulatory standard for adequacy. The project may proceed to state permitting. However, I remind the proponent that a submission of a NPC is required if there is a change in the location of the pipeline and take station. State agencies should submit final Section 61 findings to the MEPA Office for the project record.

February 17, 2006 DATE

Stephen R. Pritchard, Secretar

Comments Received

ivision of Fisheries and Wildlife,
atural Heritage and Endangered Species Program
assachusetts Historical Commission
ape Cod Commission
epartment of Environmental Protection, Southeast Regional Office
amuel G. Mygatt, Epsilon Associates, Inc.

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Commonwealth of Massachuseits

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Wayne F. MacCallum, Director

Stephen R. Pritchard, Secretary Executive Office of Environmental Affairs

Attention: MEPA Office

Aisling Eglington, EOEA No. 13543

100 Cambridge St.

Boston, Massachusetts 02114

FEB 1 U 2006

February 10, 2006

Project Name:

KeySpan Sagamore Line Reinforcement Project

Proponent:

Colonial Gas Company d/b/a Keyspan Energy Delivery New England Approximately 13 miles in Sandwich, Barnstalile, Yarmouth, Dennis, & Harwich

Location: Document Reviewed:

Final Environmental Impact Report

NHESP Tracking No. 05-17215

Dear Secretary Pritchard:

The Natural Heritage & Endangered Species Program (NHESP) of the MA Division of Fisheries & Wildlife has reviewed the Final Environmental Impact Report (FEIR) for the KeySpan Sagamore Line Reinforcement Project and project plans (dated 12/23/05). At this time, the NHESP would like to offer the following comments in regard to rare species and their habitats.

The project site is located in Priority Habitat 1470 (PH 1470) and Priority Habitat 1762 (PH 1762) as indicated in the IIth Edition of the MA Natural Heritage Atlas. The proposed activities located in PH 1762 were determined to be exempt from the MA Endangered Species Act (MESA) Regulations (321 CMR 10.00). Since the issuance of a Certificate On The Draft EIR, the project has been revised and now includes a proposal for non-exempt activities located in PH 1470, which are subject to MESA review as noted in the Response to Comments section of the FEIR. Based on our preliminary review, we anticipate being able to provide guidance to avoid a "take" under MESA, in the event that we determine a "take" will occur once we receive and review the required MESA filing requirements. We encourage the proponent to continue rare species consultation with the NHESP. If you have further questions regarding this letter please contact Dan Nein, Endangered Species Review Biologist, at (508) 792-7270 ext 151.

Sincerely,

Thomas W. French, Ph.D. Assistant Director

cc:

KeySpan Energy Delivery New England Sandwich Conservation Commission **Barnstable Conscrvation Commission** Sandwich Planning Board Barnstable Planning Board Sam Mygatt, Epsilon Associates, Inc.

www.masswildlife.org



The Commonwealth of Massachusetts

William Francis Galvin, Secretary of the Commonwealth Massachusetts Historical Commission FEB 10 2006

February 8, 2006

Secretary Stephen R. Pritchard Attn.: Aisling Eglington, MEPA Unit Executive Office of Environmental Affiars 100 Cambridge Street, Suite 900 Boston, MA 02114 et P

RE: Keyspan Sagamore Line Reinforcement Project, Dennis, Sandwich, Barnstable, Yarmouth, Harwich, MA. PAL #1744.01, MHC #RC.37191, **EOEA** #13543.

Dear Secretary Pritchard:

Staff of the Massachusetts Historical Commission have completed a technical review of the report entitled Archaeological Reconnaissance Survey, KeySpan Sagamore Reinforcement Project, Sandwich, Barnstable, Yarmouth, Dennis, and Harwich, Massachusetts, prepared by the PAL. MHC also reviewed the Final Environmental Impact Report (FEIR) for the proposed project referenced above and refined project plans for the Middle Segment from Epsilon Associates, Inc.

The 13.1 mile project area entails placement of 4.9 miles of 12" pipe along the Middle Segment preferred route, 1.6 miles of 12" pipe along the Eastern Segment preferred route, and 6.6 miles of 20" pipe along the Western Segment preferred route. Alternate routes have been identified for each of these segments as well.

Portions of the preferred route of the Middle Segment were considered by the PAL to be sensitive for containing significant archaeological resources. However, subsequent to the PAL report refined project plans were prepared and reviewed by the MHC. It appears to the MHC that locations of the pipeline that are proposed to be installed along High Bank Road, Great Western Way, Great Western Road, and Depot Street consist of existing roadbeds, and other areas that lack integrity as a result of previous construction impacts. Therefore, the preferred route for the Middle Segment is unlikely to affect any significant historic and archaeological resources.

MHC requests that KeySpan consider the recommendations of the reconnaissance survey to avoid locating the pipeline in areas outside of the paved town rights-of-way that are assigned a moderate to high archaeological sensitivity. If alternative pipeline routing cannot avoid the archaeologically sensitive portions in the Eastern and Western Segments, then MHC requests that an Intensive (Locational) Archaeological Survey (950 CMR 70) be conducted.

Additional information is required to evaluate what effects, if any, the above-ground facilities (e.g., meter and regulator stations, etc.) may have on historic resources in the area of potential effect.

Additionally, temporary staging and storage areas (e.g., pipe yards, etc.) should be identified. The project cultural resource consultants should evaluate these aspects of the project and submit the information to the MHC for review.

These comments are offered to assist in compliance with MGL c. 9, ss. 26-27C (950 CMR 71) and MEPA (301 CMR 11). If you have any questions or need additional information, please feel free to contact Gregory R. Dubell of my staff.

Sincerely,

Brona Simon
State Archaeologist
Deputy Historic Preservation Officer
Acting Executive Director
Massachusetts Historical Commission

Samuel G. Mygott, Epsilon Associates, Inc.
Deborah C. Cox, PAL, Inc.
DEP-SERO
MA Energy Facilities Siting Board
MA Department of Telecommunication & Energy
Barnstable Historical Commission
Sandwich Historical Commission
Dennis Historical Commission
South Dennis Historic District Commission
Harwich Historical Commission
Yarmouth Historical Commission

MEMORANDUM

TO:

Aisling Eglington, Environmental Reviewer, MEPA Unit

THROUGH: David DeLorenzo, Deputy Regional Director David Johnston, Deputy Regional Director Millie Garcia-Surette, Deputy Regional Director

CC:

Elizabeth Kouloheras, Chief, Wetlands and

Team Leader, Cape Cod Watershed

Richard Keith, Chief, Municipal Services Gerard Martin, Chief, Site Management Leena McQuaid, Commissioner's Office

FROM:

Sharon Stone, SERO MEPA Coordinator

DATE:

February 10, 2006

RE:

FEIR EOEA #13543 - SANDWICH/BARNSTABLE

YARMOUTH/DENNIS/HARWICH Keyspan Line Reinforcement Project

"For Use in Intra-Agency Policy Deliberations"

The Southeast Regional Office of the Department of Environmental Protection has reviewed the Final Environmental Impact Report (FEIR) for the proposed Keyspan line reinforcement project to be located on Service Road Sandwich/Barnstable); White's Path, Great Western Road, Highbank Road, Upper County Road, Great Western Way, Great Western Road, Depot Street (Yarmouth, Dennis, Harwich); Route 39 (Harwich), Massachusetts (EOEA #13543). The project proponent provides the following information for the project:

"Colonial Gas Company d/b/a/ KeySpan Energy Delivery New England plans to construct approximately 13.1 miles of new high-pressure, distribution pipeline on Cape Cod in order to reinforce its natural gas supply system."

The Cape Cod Watershed Team has reviewed the FEIR for Bureau of Resource Protection issues including Wetlands and Waterways, Water Supply, Water Management and Water Pollution Control and all indicate no comments on the project as proposed at this time.

Based on the information provided in the FEIR, the Bureau of Waste Site Cleanup (BWSC) searched its database for disposal sites and release notifications. The subject project is adjacent to the Service Road in Sandwich, the Service Road in Barnstable, Whites Path and Great Western Road in Yarmouth, Great Western Road in Dennis, and Great Western Road, Depot Street and Route 39 in Harwich. Along these roads, there are multiple former disposal sites. Release Tracking Number (RTN) 4-12259, located at 295 Service Road in Sandwich, submitted a Class A2 RAO on August 12, 1996. RTN 4-15045, located on Whites Path in Yarmouth, submitted a Class A1 RAO on December 3, 1999. RTN 4-18355, located at 351 Whites Path in Yarmouth, submitted a Class A1 RAO on June 18, 2004. RTN 4-6051, located at 351 Whites Path in Yarmouth, was determined to require no further action on December 23, 1995. RTN 4-0187, located at 383 Whites Path in Yarmouth, was determined to require no further action on July 23, 1993. RTN 4-13727, located at 52 Whites Path in Yarmouth, submitted a Class A2 RAO on March 18, 1999. RTN 4-14367, located at 196 Great Western Road in Dennis, submitted a Class A2 RAO on November 26, 1999. RTN 4-0277, located on Great Western Road in Dennis, was determined not to be a disposal site on July 23, 1993. In addition, there were two reportable releases in the vicinity of the proposed project including RTN 4-0518, located at 62 Depot Street in Harwich which submitted a Class C RAO on December 23, 2003 and RTN 4-12473, located at 389 Whites Path in Yarmouth.

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

The DEP Southeast Regional Office appreciates the opportunity to comment on this proposed project. If you have any questions regarding these comments, please contact Sharon Stone at (508) 946-2846.



CAPE COD COMMISSION

3225 MAIN STREET P.O. BOX 226 BARNSTABLE, MA 02630 (508) 362-3828 FAX (508) 362-3136 E-mail: frontdesk@capecodcommission.org

February 10, 2006

Secretary Stephen R. Pritchard Executive Office of Environmental Affairs Attn: MEPA Office, Aisling Eglington EOEA No:13543 100 Cambridge Street Suite 900 Boston, MA 02114

Sagamore line Reinforcement Project: Final EIR Re:

EOEA#:13543

Dear Secretary Pritchard:

Cape Cod Commission (Commission) staff have reviewed the documentation and exhibits included in the Final Environmental Impact Report (FEIR) for the proposal by KeySpan Energy Delivery New England for the Sagamore Line Reinforcement Project in the towns of Sandwich, Barnstable, Yarmouth, Dennis and Harwich, MA. The project includes the reinforcement of the existing natural gas supply system by constructing 6.5 miles of new 12-inch diameter distribution pipe and 6.6 miles of new 20-inch diameter distribution pipe. The FEIR describes how the project will comprise three distinct segments referred to as the Western, Middle and Eastern segments. The Western segment travels through Sandwich and Barnstable, the Middle segment travels through Yarmouth, Dennis and Harwich and the Eastern segment is located wholly within Harwich.

The Cape Cod Commission has not formally reviewed the FEIR, however, the Commission staff have reviewed the materials in the context of the Minimum Performance Standards (MPS) set forth in the 2002 Regional Policy Plan (RPP) and offer the following comments.

General

As the proposed project required the preparation of a DEIR, it is considered to be a mandatory Development of Regional Impact (DRI) under Section 12(i) of the Cape Cod Commission Act. The project proponent has not elected to follow the Joint Review process established by the Memorandum of Understanding (MOU) between the Executive Office of Environmental Affairs and the Cape Cod Commission. However, the FEIR

acknowledges that the proponent will submit a DRI application in the first quarter of 2006 upon completion of the MEPA environmental review process.

Wetlands and Wildlife

Except as noted below, the work area for the project will occur within 10 feet of the paved shoulder area, with 20-25 feet of construction space needed. Since the filing of the DEIR, the proponent has changed a portion of the Western segment to include the construction of a gate station approximately 190 feet west of the Route 130 pavement. As noted in the FEIR, this change would affect land within the Route 130 layout as well as the parcel immediately to the west, which is part of the Shawme-Crowell State Forest owned by Massachusetts Department of Conservation and Recreation (DCR).

Rare Species

As discussed in previous comment letters, portions of the Preferred Alternative, including the area west of Route 130 added to the Western segment, are located within areas mapped by the Natural Heritage and Endangered Species Program (NHESP) as Priority or Estimated habitat for rare species. A previous comment letter from NHESP (dated June 14, 2005 and included in the DEIR) identifies rare plant and animal species found in the vicinity of the route and states that a botanical survey is warranted along portions of the Service Road. The proponent notes in the FEIR that with the new Massachusetts Endangered Species Act (MESA) exemption provided to utilities within 10 feet of paved roadway, an NHESP filing is no longer required and the botanical survey is unnecessary.

The RPP prohibits development that would adversely impact rare species or their habitat. Therefore, the project proponent must demonstrate that the proposed development will not adversely impact rare species or their habitat to be approved by the Commission as a DRI. As the site/work plans are further developed the proponent will need to consult with and provide comments from NHESP to demonstrate that the project is consistent with the RPP standard and does not adversely affect the habitat of local populations of rare wildlife and plants.

As noted above, the proposed new addition to the Western segment of the route would affect land mapped for rare species and which is part of the Shawme-Crowell State Forest. This new portion of the project, which entails development within public conservation land, will require conversion of lands protected under Article 97 of the state constitution. The proponent will need to demonstrate during DRI review that the project will not have adverse impacts to land held for conservation or preservation purposes.

Wetlands

The Preferred Route passes within the wetland resource areas at the Bass River crossing and at a culverted stream crossing on Great Western Road. As discussed in previous comments, the RPP prohibits development within the 100-foot wetland buffer area (though provisions are made for utility installation where no alternative exists). The project's Environmental Construction Plan (ECP) describes clearing methods and sediment and

erosion control measures designed to minimize impacts to wetland resources from construction activities. The FEIR states that the wetland crossings will avoid bordering wetlands and that the project will be in paved road where it crosses the buffer areas, however, the proponent will need to provide detailed construction plans of the wetland crossings as part of the DRI review and as the design of each segment is finalized.

Hazardous Materials/Wastes

The FEIR responds to the Commission's comments on the DEIR concerning the refueling and maintenance of construction equipment by stating that "all refueling (will) take place at commercial service stations or contractors' facilities" and that "field maintenance and refueling in the field will be prohibited" (response to comment CCC10 and CCC11). If the Applicant adheres to such a condition, it will lessen the potential impacts to Wellhead Protection Areas (WHPA) located along the route in a manner that is consistent with the manner in which the Cape Cod Commission's water resources and hazardous materials minimum performance standards have been applied to pipeline projects.

It should be noted that the Environmental Construction Plan (ECB) submitted in Appendix E of the FEIR needs to be updated to reflect the project's proposed refueling and maintenance strategy. For instance, Section 8.1.3 of the ECB states that equipment can be refueled and lubricated within the right of way and should be revised to state that refuelling, lubrication or maintenance in the field is prohibited.

Cultural Resources

The FEIR appears to adequately address issues related to historic and archaeological resource protection. To address possible impacts in historically sensitive areas, the applicant will apply to the South Dennis Historic District Commission. They should also work with the Harwich Historical Commission to address possible concerns in the area of Union Cemetery in Harwich.

As noted in the document, the Massachusetts Historical Commission (MHC) is currently reviewing an archaeological survey report for Phase I of the proposed Middle Segment to determine if there are archaeological resource concerns. The Cape Cod Commission will use MHC's findings to determine whether the proposed work is consistent with RPP standards related to protection of archaeological resources.

The FEIR states that the applicant will complete any archaeological survey work required for future phases of the Middle Segment prior to making application to the Cape Cod Commission for approval of detailed plans. This will give the Commission an opportunity to determine whether archaeologically sensitive areas are being avoided, or whether alternative pipeline routes need to be considered in some areas to meet RPP standards.

Thank you for the opportunity to comment,

Sincerely,

Margo Fenn

Executive Director

Cc: David Ansel, Barnstable Delegate to the Cape Cod Commission Robert Jones, Sandwich Delegate to the Cape Cod Commission Leo Cakounes, Harwich Delegate to the Cape Cod Commission Brad Crowell, Dennis Delegate to the Cape Cod Commission

Samuel Mygatt, Epsilon Associates, 3 Clock Tower Place, Suite 250, Maynard,

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