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CAPE COD
COMMISSION

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By Electronic Mail

December 23, 2015

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: *Expanded Environmental Notification Form - 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 supports the natural gas main replacement project outlined in National Grid's Expanded Environmental Notification Form, and further, supports expediting the permitting and construction of the project as it constitutes critical infrastructure to the Cape Cod region.

For the reasons that follow, the Commission suggests that any long term, regional land use impacts and concerns under its jurisdiction occasioned by the project have been sufficiently addressed in the EENF, and, accordingly, would support a determination under MEPA that the EENF is adequate and no EIR need be prepared. Alternatively, the Commission would support a determination that a Single EIR be prepared, which would be sufficient to address any issues raised in the EENF that you deem outstanding.

The EENF responds in large measure to the service moratorium on the mid and lower Cape announced by National Grid in 2014. Since that time, the Commission has participated in and hosted regular meetings between the company and municipal and business stakeholders to collaboratively develop an infrastructure plan that meets the needs of the region and minimizes harm to the environment. Lifting the service moratorium as soon as practicable was a clearly articulated priority in these meetings. The replacement project will provide safe and more reliable gas service to the region.

National Grid intends to replace 18.1 miles of existing gas main primarily with new, 12-in. diameter main within the towns of Yarmouth, Dennis, Brewster and Harwich, to operate at 200 psig. As proposed, impacts to natural resource areas have been minimized or avoided. The work will occur in previously disturbed or existing paved areas. The proposed project route is

confined to existing roadway layouts, with main placement directly beneath or within several feet of existing road pavement, and does not involve tree clearing or removal. The existing main would largely be abandoned in place. Where work is proposed adjacent to wetlands, the work will occur within existing bridges or culverts. Work proposed in mapped rare species habitat is again located within existing paved roadways or within 10 ft of the roadway, and as such is an exempt activity under the MESA regulations. The project area does not pass through coastal resource areas.

Though the proposed pipeline route traverses several marine water recharge areas, many of which drain to nitrogen impaired embayments, and through several Freshwater Recharge Areas, including recharge areas to impaired ponds (e.g. Lower Mill Pond and Walkers Pond), the proposed pipeline will not withdraw water, generate wastewater, entail subsurface disposal, or contribute additional nitrogen loading. As such, the Commission suggests that the project will have negligible long-term nutrient impacts on water resources.

Stormwater runoff during construction will be contained with best management practices including the use of hay bales, silt fences, and the placement of silt sacks for existing catch basins. Additionally, stormwater impacts will be minimized by compliance with the project's NPDES General Permit. Once the pipeline is complete, disturbed vegetated areas will be loamed and seeded to match pre-existing vegetation. As such, the Commission suggests that the project will not have long-term impacts to stormwater quality or permanently and detrimentally alter existing drainage.

The Commission does note that there may be some short term land use impacts caused by construction-related operations, which the Commission suggests could adequately be addressed in the applicant's construction plans. The Commission would be happy to continue to work with the company and municipalities as construction plans are developed:

- The Commission encourages continued dialogue between NGRID and municipalities in the development of the Traffic Management Plan and coordination with local transportation projects;
- Mitigation efforts to control spills, trench de-watering, stormwater, and erosion and sedimentation are imperative to ensuring compliance with water resources goals during construction;
 - Groundwater will likely be encountered in some areas during construction-period trenching. De-watering plans submitted by the applicant include many best practices to ensure minimal impact to water resources: hoses will be elevated to prevent sediment intake, pumps will have secondary containment, and trench water will be discharged through filter bags when the discharge occurs within 100 feet from a wetland or water body. Once the pipeline is complete, 572,960 gallons of water (likely municipal water) will be used for leak testing the pipeline. After testing, the water will be directed to tanks and transported to an approved wastewater treatment facility;
 - The proposed pipeline passes through several Wellhead Protection Areas (WPAs) and runs adjacent to Potential Public Water Supply Areas. Though the project does not anticipate using, handling, or generating any hazardous materials, refueling and equipment servicing operations within WPAs may pose a threat to drinking water quality. Protocols for refueling construction equipment should be

- established by the applicant, consistent with the project's location in the above-referenced water resource areas;
- Though no water quality impacts on groundwater are anticipated during project construction, the applicant should provide the location of parcels containing and potentially containing private wells within 400 feet of construction-related activities to ensure compliance with General Aquifer Protection goals and Drinking Water Quality goals;
 - Erosion and sedimentation control measures and other environmental protection issues associated with construction will be outlined in an Environmental Construction Plan (ECP) to be prepared by the applicant.

Thank you for the opportunity to provide comments on the above-referenced Expanded Environmental Notification Form (EENF). Cape Cod Commission staff is available and happy to answer any questions about these comments.

Sincerely,



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