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October 30, 2020

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
EXPANDED ENVIRONMENTAL NOTIFICATION FORM

PROJECT NAME	: Hoosic River Bank Stabilization and Erosion Control Project
PROJECT MUNICIPALITY	: Adams
PROJECT WATERSHED	: Hudson River
EEA NUMBER	: 16273
PROJECT PROPONENT	: New England Power Company d/b/a National Grid
DATE NOTICED IN MONITOR	: September 23, 2020

Pursuant to the Massachusetts Environmental Policy Act (MEPA; M.G. L. c. 30, ss. 61-62I) and Section 11.06 of the MEPA regulations (301 CMR 11.00), I hereby determine that this project **requires** a mandatory Environmental Impact Report (EIR). The Proponent submitted an Expanded Environmental Notification Form (EENF) to support the request that I allow a Single EIR to be prepared in lieu of a Draft and Final EIR pursuant to 301 CMR 11.06(8). The Proponent should submit a Single EIR in accordance with the Scope included in this Certificate.

Project Description

As described in the EENF, New England Power Company d/b/a National Grid (NEP) (Proponent) is proposing bank stabilization in four areas of the Hoosic River to support its existing electric transmission infrastructure which includes two wood poles, two steel towers and one steel pole. The proposed project includes three major components: (1) bank stabilization utilizing biostabilization measures in four separate locations along the Hoosic River; (2) the installation of sheet piles to protect three existing transmission line structures; and (3) the replacement and relocation of one structure approximately 20 feet farther from the river. The project is proposed to both protect critical transmission line structures and improve the resiliency and reliability of the existing infrastructure.

The Proponent operates three transmission lines (J10, Q117, and E131) that run parallel in east-west alignments and connect to the Adams 21 Substation. There are 13 structures (STRs) within 100 feet of the Hoosic River, five of which are susceptible to damage due to their close proximity to the river. At this location, the banks of the Hoosic River exhibit severe signs of erosion including bank undercutting and failure, putting multiple electrical structures at risk of damage or failure. Bank failure at this location has already resulted in infrastructure damage.

Project Site

The project site is approximately 4.75 acres and is located primarily at 2 Zylonite Station Road in Adams. Although the full area of the parcels is approximately 80 acres, only 4.75 of those acres are within the limit of disturbance and included within the Project Site. The majority of the site is located within the Proponent's right-of-way (ROW) and a NEP-owned parcel east of the Adams 21 Substation off of Zylonite Station Road.

According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map (FIRM) number 2500160005B, effective August 1, 1983, the site is located within a 100-year floodplain with a Base Flood Elevation (BFE) of 721.5 feet North American Vertical Datum of 1988 (NAVD 88). The site contains the following wetland resource areas: Riverfront Area, Bordering Land Subject to Flooding (BLSF), Bank, Land Under Water (LUW) Bodies and Waterways, and Bordering Vegetated Wetlands (BVW). According to the Natural Heritage and Endangered Species Program (NHESP), the site is located within mapped *Priority* and *Estimated Habitat* of the Longnose Sucker *(Catostomus catostomus),* which is listed as Species of Special Concern, the Hairy-Fruited Sedge (Carex trichocarpa), a plant Species of Special Concern, and the Foxtail Sedge (Carex alopecoidea), a Threatened plant.

The EENF includes a summary of a study of how the water from both the Hoosic River and the surrounding wetlands has shaped the landscape near the project site. The EENF concludes that the bank instability and erosion at the site are the result of multiple anthropogenic and environmental factors. These factors include: historic human alterations of the channel (e.g. artificial channel straightening, bank armoring with large rocks, narrowing of streams at road crossings), historic human alterations of the floodplain (i.e. land conversion), and changes in the natural discharge regime.

Land uses within the site include electric utility facilities and agriculture. The site has been historically disturbed as a result of the construction and maintenance of utility infrastructure, which is highly concentrated in this area. In addition, portions of the site and the majority of the land around the site have been in agricultural use for decades. Agricultural land borders the Hoosic River to the north and south of the Site. West of the Substation, land use includes industrial and residential properties.

Environmental Impacts and Mitigation

The project will result in both temporary and permanent impacts to wetland resource areas associated with the Hoosic River. Potential environmental impacts of the project include alteration of 550 linear feet (lf) of Bank (permanent), 69,250 square feet (sf) of BVW (temporary) and 100 sf of BVW (permanent), 10,450 sf of LUW (temporary) and 4,850 sf of LUW (permanent), 29,400 sf of BLSF (temporary), and 60,900 sf of Riverfront Area

(temporary) and 100 sf of Riverfront Area (permanent). These resource areas provide habitat for rare species. The project will also disturb 2.74 acres of land, of which 2.63 acres comprise temporary impacts.

Measures proposed to avoid, minimize and mitigate environmental impacts include the proposed biostabilization technique of using log crib walls to minimize river constriction as compared to other biostabilization options that redirect the flow and that would constrict the channel. Construction mats will be used to minimize impacts from construction equipment, and sedimentation and erosion controls will be installed around work areas to minimize impacts to water quality. As described below, the Proponent has selected an overall project design that meets project goals while minimizing impacts to surrounding wetlands compared to other alternatives.

Permitting and Jurisdiction

The project is undergoing MEPA review and requires submission of a mandatory EIR pursuant to 301 CMR 11.03(3)(a)(1)(a) because it requires Agency Actions and will alter one or more acres of salt marsh or bordering vegetated wetlands. The project also exceeds the ENF thresholds at 301 CMR 11.03(3)(b)(1)(b), alteration of 500 or more linear feet of bank along a fish run or inland bank; 301 CMR 11.03(3)(b)(1)(e), new fill or structure within a regulatory floodway; and 301 CMR 11.03(2)(b)(2), disturbance of greater than two acres of designated priority habitat, as defined in 321 CMR 10.02, that results in a take of state-listed endangered or threatened species or species of special concern. The project requires a Section 401 Water Quality Certificate (WQC) and a Chapter 91 (c. 91) License from the Massachusetts Department of Environmental Protection (MassDEP) and a Conservation and Management Permit (CMP) from the NHESP. The project is subject to the MEPA Greenhouse Gas (GHG) Emissions Policy (GHG Policy).

The project requires an Order of Conditions from the Adams Conservation Commission (or, on appeal, a Superseding Order of Conditions from MassDEP). It requires the filing of a Pre-Construction Notification (PCN) with the ACOE and may require a National Pollutant Discharge Elimination System (NPDES) Construction General Permit from the U.S. Environmental Protection Agency (EPA).

Because the Proponent is not seeking Financial Assistance from the Commonwealth for the project, MEPA jurisdiction extends to those aspects of the project that are within the subject matter of required or potentially required Agency Actions and that may cause Damage to the Environment as defined in the MEPA regulations.

Single EIR Request

The MEPA regulations at Section 11.06(8) indicate that an Single EIR may be allowed, provided that the EENF: a) describes and analyzes all aspects of the project and all feasible alternatives, regardless of any jurisdictional or other limitation that may apply to the Scope; b) provides a detailed baseline in relation to which potential environmental impacts and mitigation measures can be assessed; and, c) demonstrates that the planning and design of the Project use all feasible means to avoid potential environmental impacts.

Review of the EENF

The EENF provided a description of the project, project plans, an alternatives analysis, and identified measures to avoid, minimize and mitigate project impacts. It included a Wildlife Habitat Evaluation, provided a copy of National Grid's guidance document for Access, Maintenance and Construction Best Management Practices, and a discussion of how the integrity of the banks within the site may be further threatened by the effects of climate change.

On October 6, 2020, the MEPA office held a virtual site visit for project. The Proponent submitted on October 16, 2020 a Memorandum responding to comments raised during the site visit. The Memorandum discusses whether the lack of vegetation at this location has caused or contributed to the erosion at issue. To date, the Proponent has maintained the vegetated riparian corridor at this location in a manner consistent with its established vegetation management practices. According to the Memorandum, the Proponent has also developed a shrub planting plan that will add species that are suitable for the river system and for use under utility lines. These species are outlined in Section 5.3.1 of the EENF. The Proponent has also committed to plant shrubs on top of the crib wall that, over time, will create an additional stabilizing root system to the bank. After these additional species and crib wall shrubs are planted, the Proponent will coordinate with vegetation management staff to monitor growth and minimize the cutting of woody vegetation within the project area to ensure that a stable bank of low-lying vegetation is maintained.

Alternatives Analysis

According to the EENF, the project is necessary to improve the reliability of the transmission system in Western Massachusetts. The EENF evaluates options to meet the project goal of protecting critical infrastructure from erosion. As part of the alternatives analysis, the EENF considered and balanced environmental impacts, cost, long-term project benefits, and electrical infrastructure safety requirements. The alternatives analysis consists of eight different options including combinations of structure replacement and relocation, sheet pile installation, and biostabilization. Due to the presence of Riverfront Area, BLSF, Bank and LUW at the site, impacts to these areas are unavoidable to meet the project goals. The Preferred Alternative has been designed to minimize impacts to these jurisdictional resource areas to the extent practicable while providing bank stabilization and structural support in areas prone to future erosion during potential flood events.

The Project's purpose is to stabilize the structures on the J10, Q117, and E131 transmission lines and banks along the Hoosic River to prevent erosion during high water flows. Each alternative provided a different means of stabilizing the banks of the Hoosic River and protecting the electric transmission line structures. The EENF considered the following: Alternative 1: No Action; Alternative 2: Civil Base Option; Alternative 3A: Sheet Pile Option; Alternative 3B: Civil (Modified) Option (the Preferred Alternative); Alternative 4: Double Circuit Tower Option; Alternative 5A: Relocate STR 85 Ahead on Line; Alternative 5B: Relocate STR 85 Transversely; and Alternative 5C: Relocate STR 85 Back on Line.

Alternatives 2, 3A and 3B incorporate bank stabilization measures. Alternatives 4, 5A, 5B and 5C propose moving infrastructure rather than stabilizing banks. Each of these Alternatives was evaluated based on environmental impact, cost, reliability, construction

feasibility, long-term benefit, and compliance with Independent System Operator-New England (ISO-NE) and the National Electric Safety Code (NESC). An evaluation of each Alternative is provided below, and a summary matrix has been included at the end of this section. Through these assessments the EENF determined that the Preferred Alternative (Alternative 3B) is the alternative that best meets the identified need, with a minimum impact on the environment at the lowest possible cost.

The site is extremely constrained due to the proximity of the structures and the Adams 21 Substation to the Hoosic River, and the high density of multiple transmission and distribution structures which all tie into the Substation at this location. Relocation of structures would result in changes to spans, which may require different structure heights. The EENF concludes that changes in structure heights may conflict with the different heights between phases of an adjacent line and also conflict with ISO-NE and/or NESC safety requirements. In some cases, structure replacement and relocation were considered, but the proposed configuration (outside of resource areas) would not be in compliance with ISO-NE and/or NESC.

The "No-Action" alternative leaves the current transmission line structures in place without making any provisions to protect them from the river's erosional forces. This alternative would not have any immediate impacts to the environment and no cost in the short term. However, this alternative was dismissed because it would lead to an eventual structure failure if the current rate of erosion persists. This alternative also poses a potential for long-term higher costs (in the event of an emergency repair) and resource area impacts. In addition, a failure of the transmission lines would prevent the Proponent from providing electrical service until repaired. This alternative does not meet the project need and purpose and was therefore ruled out. Alternative 2 includes bank biostabilization (i.e. crib wall installation) at four locations (STRs 85, 86 / P6, STR 1B, and STR 179), sheet pile installation at one structure (STR 86/ P6), and the relocation of STR 1B. Although a crib wall is proposed at STR 85, no sheet pile is proposed for this alternative. Due to its close proximity to the river, the Proponent has determined that STR 85 needs more protection than a crib wall alone due to the excessive erosion at this location. This alternative would result in extensive temporary and permanent environmental impacts to rare species habitat (plants and fish) and wetland resource area impacts to Bank, BVW, LUW, BLSF, and Riverfront Area. As compared to other alternatives, Alternative 2 has a reduced cost ($2.1 million) (if work for STR 85 is not included) and comparatively minimal construction effort. However, the Proponent determined that this alternative did not offer sufficient long-term benefits and protection for STR 85, unless more extensive work with significant environmental impacts were implemented for STR85. For these reasons, this alternative was rejected.

Alternative 3A includes sheet pile installation at five locations (STR 85, STR 86 / P6, STR 1B, STR 179, and STR 180) and the relocation of STR 1B. No bank biostabilization is proposed for this alternative. Compared to other alternatives, Alternative 3A has comparatively simpler design and constructability considerations, but a greater cost compared to other options ($3.6 million). This alternative would also result in fewer wetland resource impacts to LUW than Alternative 3B. However, according to the EENF, during initial conversations with MassDEP and NHESP determined that the sheet piles were not a favorable option because of greater impacts to designated habitat of rare species.

Alternative 3B (the Preferred Alternative) combines crib wall, sheet pile installation

and structure relocation. This alternative includes installation of a linear sheet pile and crib walls at STR 86 / P6 and STR 85, the structures that are most susceptible to the erosive forces of the river. Log crib walls will also be installed at STR 1B and STR 179. STR 1B will be relocated farther from the river. This is the preferred alternative because it meets the project goals of providing a permanent solution to protect existing infrastructure while also incorporating green infrastructure (i.e. log crib walls) into the design. According to the EENF, this solution includes biostabilization techniques along the riverbank which was deemed a more acceptable design by MassDEP and NHESP as compared to sheet pile installation along the river bank. Also, Alternative 3B has less temporary environmental impacts (~ 64,000 sf) than any of the alternatives proposing structure relocation (Alternatives 5, 5A, 5B, and 5C). In addition, the projected cost ($3.2 million) is within the middle of the range estimated from the alternatives; it is neither the least nor most expensive.

Alternative 4 includes a combination of sheet pile installation, pole relocation, and pole replacement, without crib wall installation. Similar to Alternatives 5A, 5B, and 5C, this alternative considers moving infrastructure rather than stabilizing the banks (Alternatives 2, 3A, and 3B). This alternative would reduce the number of structures within wetland resource areas including BVW, BLSF, and RA through the installation of a double circuit tower and would therefore reduce environmental impacts as compared to other alternatives. The projected cost for Alternative 4 ($3.1 million) is in the middle of the range estimated from the alternatives. Although this would result in fewer impacts compared to bank stabilization options, the Proponent rejected this alternative because the structure replacements would not comply with ISO-NE requirements. Alternative 4 would replace Structures 85 and 86 with four steel monopole double circuit towers (DCTs). Creating DCT configurations on a line is not recommended by ISO Planning Procedure No. 3, because in case of an emergency or contingency event at one DCT, multiple lines could be negatively impacted. This multiple-line service interruption would have cascading effects throughout the region, as opposed to a single-line service interruption that would have more limited impacts. Electrical service is typically designed to include redundancies to avoid contingency events, and DCT towers undermine that redundancy. Because this line has been designated as critical by ISO, a DCT configuration would not satisfy ISO Planning Procedure No. 3 and this alternative was rejected. This alternative would also result in a "Take" of rare plants within the site. In addition, due to reliability concerns, NEP is in the process of phasing out double circuit towers throughout their transmission network

Alternative 5A includes a combination of sheet pile installation, pole relocation, and pole replacement, without crib wall installation. Similar to Alternatives 4, 5B, and 5C, this alternative considers moving infrastructure rather than stabilizing the banks (Alternatives 2, 3A, and 3B). Relocation of STR 85, which was recently replaced in 2018 as part of emergency work, was also considered in Alternatives 5A, 5B, and 5C. This Alternative 5A includes the relocation of STR 85 and the replacement of STR 86. Alternative 5A would move STR 85 by 100 feet closer to the bank of the Hoosic River and closer to STR 86. Under this alternative, the structure's new location would be in the riverbed, so this alternative was rejected. This alternative was also rejected because it does not prevent erosion issues at STRs 86 / P6 or STR 179, leaving these structures susceptible to failure in the event of continued bank erosion. In addition, this alternative would result in a "Take" of rare plants and require modifications to multiple structures in the vicinity. Along with Alternative 5C, this alternative is also among the most expensive options ($2.4-$4.5 million).

Alternative 5B includes pole relocation, without any crib wall installation proposed. Similar to Alternatives 4, 5A, and 5C, this alternative considers moving infrastructure rather than stabilizing the banks (Alternatives 2, 3A, and 3B). Alternative 5B would move STR 85 transversely 50 feet to the north or south, within the bounds of Proponent's right-of-way. If moved to the south, STR 85 would be located in the riverbed, which was not an acceptable option. If moved to the north, STR 85 would be too close to the energized Q117 line. This relocation of STR 85 would place the structure dangerously close to the energized Line Q117. This alternative was ruled out because it does not comply with NESC safety requirements. NESC requires in NESC Rule 233 that Proponent maintain a minimum distance between conductors on supporting structures within a shared right-of-way. Moving STR 85 by 50 feet to the north would not satisfy this requirement, and for this reason this alternative was rejected.

Alternative 5C includes a combination of pole relocation and pole replacement. Similar to Alternatives 4, 5A, and 5B, this alternative considers moving infrastructure rather than stabilizing the banks (Alternatives 2, 3A, and 3B). This alternative includes the relocation of STR 85 and the replacement of STR 86. In addition, two other structures would require replacement and 1B would be relocated. The proponent rejected this alternative because the increased span between STRs 85 and 86 does not comply with NESC standards. The span between STR 85 and 86 would be excessively long and the line would sag between the structures, and over the river. NESC requires that 115kV lines like the J10 line maintain a height of 23 feet from the ground. The distance between structures would create sag below this height, in violation of the standard. If Proponent were to make the line higher, this would require the construction of a new STR 86 with larger footprint and deeper below-ground impacts to support the necessary height. For these reasons, Proponent determined that the engineering and environmental tradeoffs of Alternative 5C were unreasonable and rejected this alternative. This alternative is also among the most expensive options ($4.1 million). In addition, this alternative would result in a "Take" of rare plants.

Wetlands and Water Quality

According to the EENF, the project will permanently impact Bank, LUW and BVW due to bank stabilization. The bank stabilization will involve the installation of biostabilization measures (log crib walls) at four locations to protect Structure 1B, Structure 86, Structure P6, Structure 85 and Structure 170. The crib walls will also provide wildlife and fish habitat. Additionally, linear sheet piles will be installed to protect Structure 86 / P6 and Structure 85 to ensure river flow does not undermine the transmission line structures. Structure 1B, will be relocated farther away from the river's bank. Routine maintenance will be conducted on the structures at the same time as the project to minimize temporary impacts. The Adams Conservation Commission will review the project components for consistency with the Wetlands Protection Act (WPA) and its implementing regulations (310 CMR 10.00) and associated performance standards. I refer the Proponent to comments from MassDEP regarding the required Section 401 WQC and a Chapter 91 License from MassDEP.

Temporary impacts will be largely due to the use of construction mats, which, while not completely avoiding disturbance to wetland resources areas, will minimize impacts to soil and vegetation by preventing direct contact to these areas from construction machinery. The EENF provided a plan showing the location of swamp mats that will be placed in wetlands to provide a

stable work surface and to protect wetland vegetation and soil from construction equipment. The Proponent should seek to minimize the length of time the mats are in place to reduce wetland impacts. Upon completion of construction, the areas covered by mats will be restored by reseeding, mulching and/or regrading. The Proponent will install temporary construction mats adjacent to the banks of the four biostabilization areas and at the base of each of the structures for use as equipment work platforms. In addition, the Proponent will install construction mats from both Zylonite Station Road and East Road to structures and the construction laydown yard to limit rutting or compaction of soils from vehicle traffic through the agricultural area.

The EENF reviewed the project's compliance with the Stormwater Management Standards (SMS) of the Massachusetts Wetlands Protection Regulations (310 CMR 10.00). The project is a redevelopment project and will meet the SMS to the extent practicable. The site does not have a stormwater conveyance system and the project will not add any stormwater Best Management Practices (BMPs). The project will implement sedimentation and erosion controls during construction to protect wetlands and water quality. The Proponent will also implement a Spill Prevention and Control Countermeasures Plan to prevent impacts from a release of hazardous substances.

Rare Species

As indicated in the 13th Edition of the *Massachusetts Natural Heritage Atlas,* the project site includes areas designated as *Estimated Habitat and Priority Habitat of Rare Species* for one fish species and two plant species. The proposed Project will occur within the mapped habitat of Longnose sucker (*Catostomus Catostomus*; Special Concern), Hairy-fruited Sedge (*Carex trichocarpa*, Special Concern), and Foxtail Sedge (*Carex alopecoidea*, Threatened). The NHESP has determined that the project will result in a "Take" of the Longnose Sucker and require a CMP.

During NHESP's review of the CMP application, the Proponent will be required to demonstrate that the project will provide mitigation resulting in a Net Benefit to the population of the rare species. The EENF identified potential mitigation measures such as on-site plantings within the footprint of proposed foundations, on-site habitat management, short-term and long-term population monitoring, and/or off-site survey and monitoring efforts for the impacted species.

Issuance of a CMP requires that a project avoid and minimize impacts to state-listed species in accordance with the following performance standards: 1) assess alternatives that avoid or minimize temporary and permanent impacts to the state-listed species, (2) demonstrate that an insignificant portion of the local population will be impacted or that no viable alternative exists, and (3) develop and implement a conservation plan that provides a long-term net benefit to the conservation of the local population of the impacted species. According to NHESP, potential mitigation measures that would provide long-term benefits to populations of these species are being reviewed and may include conservation research on the affected species or funding of relevant research on the species.

Climate Change

I note that the MEPA statute directs all State Agencies to consider reasonably foreseeable climate change impacts, including additional greenhouse gas emissions, and effects, such as predicted sea level rise, when issuing permits, licenses and other administrative approvals and decisions. M.G.L. c. 30, § 61. The EENF includes a discussion of how the integrity of the banks within the site may be further threatened by the effects of climate change. The region's climate is expected to experience more frequent and intense storms. The Northeast Climate Science Center at the University of Massachusetts at Amherst has developed projections of changes in temperature, precipitation and sea level rise for Massachusetts. The EENF examined the data available through the Climate Change Clearinghouse for the Commonwealth at www.resilientMA.org.

The EENF concludes that according to Massachusetts Climate Change Projections – Statewide and for Major Drainage Basins (March 2018) prepared by the Northeast Climate Adaptation Science Center, days with precipitation over one inch and total inches of precipitation may increase for the Hudson Basin, Massachusetts by mid-century (2050s) and by the end of the century (2090s). Compared to the observed baseline (data from 1971-2000), precipitation over one inch is predicted to increase by 0 - 1 days by mid-century, and by 0-1 days by the end of century for both winter (December to February) and spring (March– May) seasons. During the winter, models predict an increase in total precipitation ranging from 2% to 23% by 2050 and from 9% to 36% by 2090. During the summer, models predict a decrease of 0.3 to an increase of 2.6 inches (i.e. decrease of 2% to increase of 13%) by 2050. Potential increase in frequency of higher precipitation storm events and increase in total precipitation may lead to further erosion and failure of the banks within the site. The EENF concludes that active bank erosion and failure of armoring are both apparent and threatening to undermine at least four of NEP's structures.

In addition, the Field Geology Services memorandum for the site included as Appendix D of the EENF uses data from the Massachusetts Climate Change Projections to evaluate the project site and need for stabilization and erosion control measures at the project site. By stabilizing the banks of the Hoosic River at this location, the EENF concludes that the project will protect the river from further erosion, as well as the electric transmission infrastructure that is critical during storm events and critical to the success of renewable energy deployment efforts in the Commonwealth.

Greenhouse Gas Emissions

The project is subject to the GHG Policy because it exceeds thresholds for a mandatory EIR. The GHG Policy includes a *de minimis* exemption for projects that will produce minimal amounts of GHG emissions. Given the nature of the project, which involves resiliency measures for existing electric transmission lines and does not add new GHG emitting structures or infrastructure, I have concluded that this project falls under the *de minimis* exemption; therefore, the Proponent is not required to prepare a GHG analysis. The EENF includes commitments to use Ultra-low sulfur diesel (ULSD) fuel in construction vehicles, minimizing idling of construction vehicles, and installing circuit breakers that will minimize the leakage of Sulfur Hexafluoride (SF6) gas, a potent GHG.

Construction Period

The Proponent will implement sediment and erosion control measures, including silt curtains in the river surrounding work areas, to minimize water quality impacts. Mats will be used to minimize direct contact between construction machinery and habitat and resource areas. The Proponent should minimize the potential for releases of oil and/or other hazardous materials and consider requiring that construction equipment working near the river use biodegradable hydraulic fluid and through the development and implementation of a spills contingency plan. The project must comply with the Solid Waste and Air Pollution Control regulations. I refer the Proponent to comments from MassDEP regarding construction-period requirements regarding air quality, spills prevention and solid waste management. The Proponent should notify MassDEP in accordance with the Massachusetts Contingency Plan (310 CMR 40.00) if oil and/or hazardous materials are found during construction.

Conclusion

The EENF provided extensive documentation of the project's impacts and measures to avoid, minimize, and mitigate impacts. Neither MassDEP nor NHESP identified any additional analysis that must be provided in the Single EIR for permitting. In addition, comments from the Massachusetts Board of Underwater Archaeological Resources (BUAR) and from the Massachusetts Historical Commission (MHC) do request any additional analysis. Comments from Berkshire Regional Planning Commission (BRPC) support the request for a Single EIR. Comments from both the BRPC and the Hoosic River Watershed Association request further clarification of the vegetation stabilization plan which was described in the October 16, 2020 Memorandum responding to comments raised during the site visit.

The Proponent should submit a Single EIR that provides updated project information, including any additional details regarding mitigation for impacts to wetlands and rare species in accordance with the limited Scope below.

SCOPE

General

The Single EIR should follow Section 11.07 of the MEPA regulations for outline and content, as modified by this Scope. It should include a detailed description of the proposed project and describe any changes to the project since the filing of the EENF. The Single EIR should include updated plans as necessary to reflect modifications to the project design. If necessary, it should provide a revised description and analysis of applicable statutory and regulatory standards and requirements, and a description of how the project will meet those standards. The Single EIR should include a list of required State permits, Financial Assistance, or other State approvals and provide an update on the status of each of these pending actions. The Single EIR should supplement its analysis of climate change impacts by clarifying the useful life of the project with the proposed stabilization measures, and by quantifying the specific precipitation levels or return period for which the project will be designed (e.g., whether the project as proposed will ensure the structures will withstand a certain level of rainfall or design storm over a particular planning horizon). This analysis should incorporate the best available climate data and projections, and should discuss whether similar stabilization and erosion controls will be necessitated in the future due to the impacts of climate change, and if so, when

such work may be anticipated again. The Single EIR should discuss whether the proponent is engaging in any long-range planning to enhance the resiliency of its electric transmission network as a whole, and if so, how this project fits into such general planning efforts.

Mitigation

The Single EIR should include a separate chapter summarizing proposed mitigation measures and draft Section 61 Findings for each State Agency that will issue permits for the project. The Single EIR 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.

Responses to Comments

The Single EIR should contain a copy of this Certificate and a copy of each comment letter received. In order to ensure that the issues raised by commenters are addressed, the Single EIR should include direct responses to comments to the extent that they are within MEPA jurisdiction. This directive is not intended to, and shall not be construed to, enlarge the scope of the Single EIR beyond what has been expressly identified in this certificate.

Circulation

The Proponent should circulate the Single EIR to those parties who commented on the EENF, to any State Agencies from which the Proponent will seek permits or approvals, and to any parties specified in section 11.16 of the MEPA regulations. If the Adams public library is currently open, a copy of the Single EIR should be made available for review at the Adams public library.

K. Theoharides

October 30, 2020
Date

Kathleen A. Theoharides

Comments received:

10/14/2020	Board of Underwater Archaeological Resources (BUAR)
10/15/2020	Massachusetts Historical Commission
10/22/2020	Berkshire Regional Planning Commission
10/22/2020	Hoosic River Watershed Association
10/23/2020	Massachusetts Department of Environmental Protection (MassDEP) – Western Regional Office (WERO)
10/23/2020	Natural Heritage and Endangered Species Program (NHESP)

KAT/ACC/acc

The COMMONWEALTH OF MASSACHUSETTS
BOARD OF UNDERWATER ARCHAEOLOGICAL RESOURCES
EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS
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October 14, 2020

Kathleen A. Theoharides, Secretary
Executive Office of Energy and Environmental Affairs
Attention: Anne Canaday, MEPA Unit
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Hoosic River Bank Stabilization and Erosion Control Project (EOEA #16273), Adams, MA

Dear Secretary Theoharides,

The staff of the Massachusetts Board of Underwater Archaeological Resources has reviewed the above-referenced proposed project as detailed in the *Environmental Monitor* of 23 September 2020 and offers the following comments.

The Board has conducted a preliminary review of its files, the Massachusetts Historical Commission's (MHC) Massachusetts Cultural Resources Inventory System (MACRIS), historical maps, and secondary literature sources to identify known and potential submerged cultural resources in the proposed project area. No record of any underwater archaeological resources was found. Based on the results of this review and the nature of the proposed project, the Board expects that this project is unlikely to impact submerged cultural resources.

Should heretofore unknown archaeological resources be encountered during the course of work, the Board expects that the project's sponsor will take steps to limit adverse effects and notify the Board and the MHC, as well as other appropriate agencies, immediately in accordance with the Board's *Policy Guidance for the Discovery of Unanticipated Archaeological Resources*.

The Board appreciates the opportunity to provide these comments as part of the MEPA review process. Should you have any questions regarding this letter, please do not hesitate to contact me by email at david.s.robinson@mass.gov.

Sincerely,

David S. Robinson
Director

/dsr
Cc: Brona Simon, MHC

The Commonwealth of Massachusetts

William Francis Galvin, Secretary of the Commonwealth
Massachusetts Historical Commission

October 15, 2020

Secretary Kathleen A. Theoharides
Executive Office of Energy & Environmental Affairs
Attn: Anne Canaday, MEPA Unit
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Hoosic River Bank Stabilization and Erosion Control Project, Adams, MA. MHC #RC.68680. **EEA #16273.**

Dear Secretary Theoharides:

Staff of the Massachusetts Historical Commission (MHC) have reviewed the Environmental Notification Form (ENF), and the Project Notification Form (PNF) and cultural resources assessment prepared and submitted by the PAL, Inc., for the project referenced above. The project includes bank stabilization and erosion control in the Hoosic River adjacent to electrical transmission line structures in Adams.

Review of the Inventory of Historic and Archaeological Assets of the Commonwealth indicates that no recorded historic or archaeological resources are included in the project impact area. MHC staff agree with the PAL's archaeological sensitivity assessment that the project impact area possesses low archaeological sensitivity. No archaeological survey is recommended for the project as proposed.

In the MHC's staff opinion, the project as proposed is unlikely to affect significant historic or archaeological resources. If project plans change in future, then current project information should be submitted to the MHC for review and comment.

These comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800), M.G.L Chapter 9, Sections 26-27C (950 CMR 71), and MEPA (301 CMR 11). If you have any questions or require additional information, please contact Jonathan K. Patton at this office.

Sincerely,

Brona Simon

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

xc: Dawn Travalini, National Grid
Tammy R., Turley, USACOE-NED
Nathan Allison, Stockbridge Munsee Mohican Community
Bettina Washington, Wampanoag Tribe of Gay Head (Aquinnah)
David Weeden, Mashpee Wampanoag Tribe
David Robinson, MBUAR
Deborah C. Cox, PAL

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BRPC
Berkshire Regional Planning Commission

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Executive Director

October 22, 2020

Kathleen Theoharides, Secretary
Executive Office of Energy and Environmental Affairs
Attn: Anne Canaday
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: Hoosic River Bank Stabilization EENF, EEA# 16273

Dear Secretary Theoharides:

The Berkshire Regional Planning Commission (BRPC) hereby submits comments on the Expanded ENF for the Hoosic River Bank Stabilization (EEA #16273) in the Town of Adams. The proposed project has been developed as a safety measure to stabilize the bank for existing electric transmission infrastructure along the Hoosic River. The proposed project has met or exceeded MEPA review thresholds for a Mandatory Environmental Impact Report (EIR) due to impacts to priority habitat, inland bank, bordering vegetated wetlands, isolated vegetated wetlands, and new fill or structure within regulatory floodway. The proponent has requested approval to submit a Single EIR.

The Hoosic River banks exhibit severe signs of erosion within the Site, including bank undercutting and failure, putting multiple electric transmission line structures and poles at risk of damage or failure. The banks continue to deteriorate, and significant work is required to address bank erosion to protect existing electric infrastructure. The bank stabilization involves the installation of biostabilization measures (log crib walls) along the banks at four locations and the use of log structures to stabilize the banks and protect structure anchors. In addition to biostabilization, linear sheet piles will be installed, and one structure will be relocated farther away from the river's bank.

BRPC supports the request for a Single EIR. However, it should be noted that due to the velocity and unpredictability of the Hoosic River, it is unclear that this stabilization plan will provide a final resolution to the problem. More details should be included within the SEIR as described below:

1. Clarify which areas will be restored with native seed mix application and shrub plantings.
2. It is recommended that a long-term vegetation management plan be developed for property owned and/or controlled by the New England Power Company (NEP) to establish and maintain a vegetated riverfront buffer.
3. It is recommended that NEP work closely with the local Conservation Commission and relevant non-profit organizations to ensure the protection of the river and long-term success of the bank stabilization.
4. Clarify where the proposed brush mattresses which are to be seeded with native conservation mix and native shrubs will be installed.
5. Clarify whether crib walls include live branch cuttings. If so, clarify the species to be used. If not, clarify why live branch cuttings are not proposed.

6. It is recommended that the plan should include diverse plantings to revegetate the banks, including live willow stakes and such plants as red twig dogwood, cottonwood and sycamore.
7. As stated in the alternatives analysis, during initial conversations with DEP and NHESP it was brought to light that the sheet piles were not a favorable option. Clarify in greater detail why sheet piles are included within the preferred alternative and why other alternatives were not selected.
8. Please provide additional information with regard to the longevity of the proposed project, in comparison to alternatives that include relocating NEP infrastructure.
9. Please clarify why Alternative 4 requires four steel monopole double circuit towers ("DCT"s) creating DCT configurations on a line, which is not recommended by ISO Planning Procedures.
10. Please clarify why Alternative 5C in which Structure 85 would be moved to the east, cannot be accomplished without creating an excessively long span between Structure 85 and 86 that would cause the line to sag between the structures as a result.
11. Please clarify whether alternative nature-based solutions for bank stabilization have been considered and whether the Division of Ecological Restoration has been consulted.

The BRPC Environmental Review Committee endorsed these comments at their meeting on October 21, 2020.

Sincerely,

Thomas Matuszko, AICP
Executive Director

October 22, 2020

Hoosic River Watershed Association

(Electronic copy)

Secretary Kathleen A. Theoharides
Executive Office of Energy and
Environmental Affairs
Attn. MEPA Office
100 Cambridge Street, Suite900
Boston, MA 02114

RE: MEPA project # 16273 (Hoosic River Bank Stabilization & Erosion Control Project in Adams, MA)

Dear Secretary Theoharides:

I am the President of the Hoosic River Watershed Association (HooRWA) and have been requested to review and respond to your organization regarding the subject project located in Adams, MA. The Hoosic River Watershed Association is an organization that was created 34 years ago to: defend/improve the river (along with its' 720 square mile watershed) from pollution, un-necessary encroachments, temperature changes, improving bio-diversity while enhancing recreational opportunities. Thus, as an organization, we feel HooRWA is a legitimate stake-holder in reviewing/commenting upon any project this close to the Hoosic River.

Clearly, we would rather not have this project occur however since it appears to be a legitimate, vital project for a healthy electrical grid, something should be done to protect the high-voltage utility lines.

As you know, this ENF is rather large and contains substantial detail regarding the relocation of utility poles within the floodplain of the Hoosic River along with sheet metal pole protection and wood cribbing on the riverbank. Surprisingly, it appears your engineers did consider many environmental mitigation projects to minimize the adverse effects of this construction project. The wood cribbing is especially important. Our only comment at this time is to consider utilizing many, many more red osier dogwood species on this project along the water's edge - to better stabilize the soils in and around the added wood cribbing.

Thank you,

Andrew Kawczak

Andrew Kawczak
President, Hoosic River Watershed Association
akawczak@yahoo.com
413-664-9545

CC: Kathleen Wilkins (Tighe & Bond (electronic copy))

Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection
Western Regional Office • 436 Dwight Street, Springfield MA 01103 • 413-784-1100

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Kathleen A. Theoharides
Secretary

Martin Suuberg
Commissioner

October 23, 2020

Kathleen A. Theoharides, Secretary
Executive Office of Energy & Environmental Affairs
Massachusetts Environmental Policy Act Office
Anne Canaday, EEA No. 16273
100 Cambridge Street, 9th Floor
Boston, MA 02114-2524

Re: Hoosic River Bank Stabilization Project
Adams EENF

Dear Secretary Theoharides,

The Massachusetts Department of Environmental Protection (MassDEP), Western Regional Office (WERO) appreciates the opportunity to comment on the Expanded Environmental Notification Form (EENF) submitted for the proposed Hoosic River - Bank Stabilization and Erosion Control Project in Adams, Massachusetts. Because of the proposed alteration of one or more acres of bordering vegetated wetlands, the Proponent will submit a Single Environmental Impact Report for this project. The site is located within the New England Power Company (NEP) right-of-way and a NEP-owned parcel east of the Adams 21 Substation off of Zylonite Station Road. Land uses within the Site include electric utility facilities and agriculture, with vegetated wetlands adjacent to the Hoosic River east of the Substation. The applicable MassDEP regulatory and permitting considerations regarding wetlands, waterways, air pollution, solid waste, hazardous waste and waste site cleanup are discussed.

I. Project Description

The New England Power Company d/b/a National Grid (NEP), Proponent, is proposing bank stabilization in four areas of the Hoosic River to support the existing electric transmission infrastructure including two wood poles, 2 steel towers and one steel pole (EEA # 16273). The banks exhibit signs of severe erosion within the site putting multiple transmission lines and structures and poles at risk of damage or failure. The bank stabilization will involve the installation of biostabilization measures (log crib walls) at four

locations to protect Structure 1B, Structure 86, Structure P6, Structure 85 and Structure 170. The crib walls will also provide wildlife and fish habitat. Additionally, linear sheet piles will be installed to protect Structure 86 / P6 and Structure 85 to ensure river flow does not undermine the transmission line structures. One Structure, 1B, will be relocated farther away from the river's bank. Routine maintenance will be conducted on the structures at the same time as the Project to minimize temporary impacts.

Environmental impacts associated with this project include:

- 4.75 acres - limit of disturbance
- 2.63 acres of land altered (temporary) including 104,200 SF of construction matting and approx. 10,450 SF for turbidity curtain
- 0.11 new acres of land altered (permanent) including 100 SF for Structure 1B and 4,850 SF for crib wall in LUW.
- 69,250 SF (temporary) new bordering vegetated wetlands alteration
- 100 SF (permanent) of new bordering vegetated wetlands alteration
- 100,750 SF (temporary) of new other wetland alteration
- 4,950 SF (permanent) of new other wetland alteration

II. Required Mass DEP Permits and/or Applicable Regulations

Wetlands
310 CMR 10.000
Water Quality Certificate
314 CMR 9.00
Waterways
310 CMR 9.00
Air Pollution
310 CMR 7.00
Solid Waste
310 CMR 16.00
Hazardous Waste
310 CMR 30.00
Bureau of Waste Site Cleanup
310 CMR 40.000

III. Permit Discussion

Bureau of Water Resources

Wetlands, Water Quality Certification, Chapter 91

The project is at the EENF stage. An EIR is anticipated for the project. MassDEP intends to provide more detailed technical comments and questions to the project proponent under

separate cover to assist the project proponent in preparing for the EIR and for permitting the project.

- In accordance with the Massachusetts Wetlands Protection Act (MAWPA), MGL Ch. 131, s. 40 and regulations promulgated thereunder, a Notice of Intent must be filed with the Adams Conservation Commission for the project. Prior to commencement of project construction, a final Order of Conditions must be issued.

- The Site contains the following MAWPA resource areas: Riverfront Area, Bordering Land Subject to Flooding, Bank, Land Under Water Bodies and Waterways, Bordering Vegetated Wetlands, and Estimated Habitats of Rare Wildlife.

- The in-water portion of the project proposes the following alterations to resource areas:
    - Bank: 550 linear feet (permanent)
    - Land Under Waterbodies & Waterways: 10,450 square feet (temporary) 4,850 square feet (permanent)

  MassDEP intends to review the basis for the determination and quantification of these impacts in the permitting process.

- A Chapter 91 License is required for encroachment into the Hoosic River of any structures. As currently designed, the project will require a Chapter 91 License.

- The MassDEP's Division of Wetlands & Waterways administers the 401-water quality certification program on behalf of the U.S. Army Corps of Engineers. The project, as currently designed, will require a Water Quality Certification due to the proposed discharge of fill material into *Waters of the United States within the Commonwealth*. Under the 401 regulations, 314 CMR 9.00, the proponent is required to provide sufficient information to adequately describe cumulative impacts to "Waters of the Commonwealth" (isolated and bordering vegetated wetlands and land under water). Under these regulations, impacts are to be avoided, minimized and mitigated. The applicant has provided a requisite alternatives analysis. MassDEP will work with the applicant during the WQC application process to further explore whether any additional alternatives exist that would avoid, minimize or mitigate impacts. The dredged sediments shall be managed and disposed in accordance with conditions of a 401 Water Quality Certificate Permit as detailed in the *MassDEP Interim Policy COMM 94-007 Sampling, Analysis, Handling & Tracking Requirements for Dredged Sediment Reused or Disposed at Massachusetts Permitted Landfills.*

Bureau of Air and Waste

Air Quality and Solid Waste

Construction and Demolition Activities

The construction and demolition activity must conform to current Air Pollution Control Regulations. The proponent should implement measures to abate asbestos containing materials prior to demolition and control dust, noise, and odor nuisance conditions that may occur during the construction and demolition activities. Such measures must comply with the MassDEP's Bureau of Air and Waste (BAW) Regulations at 310 CMR 7.00. In addition, all solid waste generated by this proposed project shall be managed in accordance with 310 CMR 16.00 and 310 CMR 19.000, including the regulations at 310 CMR 19.017 (waste ban).

Construction Equipment

MassDEP recommends that the project proponent participate in the MassDEP Diesel Retrofit Program. All non-road engines shall be operated using only ultra-low sulfur diesel (ULSD) with a sulfur content of 15 ppm pursuant to 40 CFR 80.510.

Hazardous Waste

If any hazardous waste, including waste oil, is generated at any of the sites the proponent must ensure that such generation is properly registered with the Department and managed in accordance with 310 CMR 30.0000.

Bureau of Waste Site Cleanup

The proponent has identified release tracking numbers (RTNs) within the project area with Response Action Outcomes (RAOs) and/or Permanent Solutions with or without conditions (PS/PSC). In addition, there are several open sites within a 0.5-mile radius from the project site including:

- RTNs 1-0019174 and 1-0016728 Former Greylock Food and Fuel, 4 Orcutt Ave., Tier ID, and
- RTN 1-0018180 Former Curtis Paper, 115 Howland Ave., Tier ID.

If soil and/or groundwater contamination is encountered during excavation activities, the proponent should retain a Licensed Site Professional (LSP); the MCP details procedures to follow for the parties conducting work. MassDEP staff are available for guidance.

In addition, a spills contingency plan addressing prevention and management of potential releases of oil and/or hazardous materials from pre- and post-construction activities should be presented to workers at the site and enforced. The plan should include but not be limited

to, refueling of machinery, storage of fuels, and potential releases. This plan is of particular importance due to the proximity of the work to the Hoosic River.

IV. Other Comments/Guidance

Section 61 Findings should be included with the Environmental Impact Report along with a discussion of potential Greenhouse Gas Emissions impacts from the construction phase of this project.

MassDEP staff is available for discussions as the project progresses. If you have any questions regarding this comment letter, please do not hesitate to contact Kathleen Fournier at (413) 755-2267.

Sincerely,

Michael Gorski
Regional Director

cc: MEPA File

MASSWILDLIFE

DIVISION OF
FISHERIES & WILDLIFE

1 Rabbit Hill Road, Westborough, MA 01581
p: (508) 389-6300 | f: (508) 389-7890
MASS.GOV/MASSWILDLIFE

October 23 2020

Kathleen Theoharides, Secretary
Executive Office of Energy and Environmental Affairs
Attention: MEPA Office
Anne Canaday, EEA No. 16273
100 Cambridge St.
Boston, Massachusetts 02114

Project Name:	*Hoosic River Bank Stabilization and Erosion Control Project*
Proponent:	*New England Power Company d/b/a National Grid*
Location:	*East of 2 Zylonite Station Road, Adams, MA*
Project Description:	*Stabilization of the Hoosic River in four (4) locations to protect electrical transmission infrastructure*
Document Reviewed:	*Expanded Environmental Notification Form (EENF)*
EEA File Number:	*16273*
NHESP Tracking No.:	*19-38786*

Dear Secretary Beaton:

The Natural Heritage & Endangered Species Program of the Massachusetts Division of Fisheries & Wildlife (the Division) has reviewed the *Expanded Environmental Notification Form* (EENF) for the "Hoosic River Bank Stabilization and Erosion Control" Project and would like to offer the following comments regarding state-listed species and their habitats.

Portions of the proposed Project are located within the *Priority Habitat* and *Estimated Habitat of Rare Species* as indicated in the 14th Edition of the *Massachusetts Natural Heritage Atlas.* Therefore, the proposed Project requires review through a direct filing with Division for compliance with the Massachusetts Endangered Species Act (MESA, MGL c.131A) and its implementing regulations (321 CMR 10.00). The proposed Project will occur within the mapped habitat of Longnose sucker (*Catostomus Catostomus*; Special Concern), Hairy-fruited Sedge (*Carex trichocarpa*, Special Concern), and Foxtail Sedge (*Carex alopecoidea*, Threatened*)*. These species are protected pursuant to MESA. Fact sheets for most state-listed rare species can be found on our website (www.mass.gov/nhesp).

The Proponent has engaged the Division in pre-filing consultations to discuss potential impacts associated with the Project. The Proponent has been working with the Division to avoid and minimize permanent and temporary impacts to state-listed species and their habitats, including initiating field studies and habitat assessments to identify key habitat areas in which to focus minimization efforts. Although a formal MESA filing has not yet been submitted, the Division anticipates – based on previously submitted information and ongoing consultations with the Proponent – that the Project will likely result in a Take (321 CMR 10.18 (2)(b)) of the Longnose Sucker and require a Conservation and Management Permit (CMP; 321 CRM 10.23) to proceed. In order for a Project to qualify for a CMP, the applicant must demonstrate that the Project has avoided, minimized and mitigated impacts to state-

listed species consistent with the following performance standards: (a) adequately assess alternatives to both temporary and permanent impacts to the state-listed species, (b) demonstrate that an insignificant portion of the local population will be impacted, and (c) develop and agree to carry out a conservation and management plan that provides a long-term net benefit to the conservation of the state-listed species. However, a MESA determination will only be made after receipt and review of a MESA Project Review Checklist (321 CMR 10.18).

The Division understands that the Project will also require review by the Massachusetts Department of Environmental Project-Western Region-Bureau of Water Resources (MADEP) and the U.S. Army Corps of Engineers (UCACE), which may result in alterations to the current project design. Therefore, the Division recommends further consultation with the Division, MADEP and UCACE to facilitate a coordinated, streamlined review and permitting process.

No alteration to the soil, surface, or vegetation associated with the filing shall occur until the MESA permitting process is complete. If you have any questions or need additional information, please contact Lauren Glorioso, Endangered Species Review Biologist, at lauren.glorioso@mass.gov or 508-389-6361. We appreciate the opportunity to comment on the Project.

Sincerely,

Everose Schlüter

Everose Schlüter, Ph.D.
Assistant Director

cc: Katy Wilkins, Tighe & Bond
Town of Adams Board of Selectmen
Town of Adams Conservation Commission
Town of Adams Planning Board