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November 16, 2018

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

PROJECT NAME : Lowell Area Gas Modernization Project
PROJECT MUNICIPALITY : Lowell, Chelmsford and Tewksbury
PROJECT WATERSHED : Merrimack, Concord and Shawsheen
EEA NUMBER : 15786
PROJECT PROPONENT : Colonial Gas Company d/b/a National Grid
DATE NOTICED IN MONITOR : October 10, 2018

Pursuant to the Massachusetts Environmental Policy Act (M.G. L. c. 30, ss. 61-62I) and Section 11.08 of the MEPA regulations (301 CMR 11.00), I have reviewed the Draft Environmental Impact Report (DEIR) and determined that it **adequately and properly complies** with MEPA and its implementing regulations. The Proponent may prepare and submit for review a Final Environmental Impact Report (FEIR).

This project is proposed to improve the reliability and safety of an existing gas distribution system and to comply with federal regulatory requirements. The project is subject to MEPA review because it will result in impacts to wetland resource areas; however, I want to note the safety concerns communities in the project area have because of the significant over-pressurization event on the natural gas distribution system in the Merrimack Valley. The planning, design, installation and maintenance of this distribution system will be informed by the independent evaluation of pipeline safety ordered by the Department of Public Utilities (DPU) on September 6, 2018 (Chairman's Third Set of Orders under G.L. c. 25, S 4B) and a letter issued by DPU on October 11, 2018. The Order directed all operators to procure and contract with a third-party evaluator to assess the physical integrity and safety of the gas distribution system and the operation and maintenance policies of the operators including recommendations for improvements. The October 11 letter directed all operators to conduct an internal review of

their procedures relating to pressure regulation, overpressure protection, energizing new and replacement pipelines, and tie-ins involving high pressure to low pressure distribution systems. These efforts are ongoing. The Scope for the FEIR requires the Proponent to address how the evaluation will influence the planning, design, implementation and maintenance of the project. I note that the project is subject to review by the Energy Facility Siting Board (EFSB) which includes analysis of environmental impacts and safety within its jurisdiction.

Project Description

As described in the Draft Environmental Impact Report (DEIR), the project will upgrade the Tewksbury Line System, which is the backbone of the Proponent's gas distribution system which serves approximately 46,7000 customers in Chelmsford, Dracut, Dunstable, Lowell, Pepperell, Tyngsborough and Westford. The Tewksbury Line System is comprised of the following three components:

- Tewksbury Mainline, a 3.9-mile long, steel pipeline that is generally 12 inches in diameter;
- Wilbur Lateral, a 2-mile long, 6- to 8-inch diameter steel pipeline; and
- Doane Lateral, a 0.9-mile long, 8-inch diameter steel pipeline.

The Tewksbury Mainline carries gas from the Tewksbury Take Station, which receives gas from the Tennessee Gas Company regional transmission system. The Tewksbury Main Line passes through Tewksbury, Billerica, Chelmsford and Lowell, where it branches into the Wilbur Lateral and Doane Lateral. The Tewksbury Mainline includes a crossing (1,915-linear feet) beneath the Interstate-495 (I-495) and Lowell Connector interchange where the pipeline varies between 6 and 8 inches in diameter. The Wilbur Lateral ends at the Wilbur Gas Regulator Station (GRS) northwest of the Tewksbury Mainline branch. The Doane Lateral ends at the Doane GRS north of the Tewksbury Mainline branch.

The project includes the replacement of sections of the Tewksbury Line System and the installation of launcher and receiver structures to facilitate the use of In-Line Inspection (ILI) equipment. The project is intended to enhance the reliability of the gas distribution system, conduct inspections and assessments of the gas transmission facilities in accordance with the federal Pipeline Safety Improvement Act of 2002, and comply with forthcoming federal regulations that will require that the maximum allowable operating pressure (MAOP) of pipelines installed prior to 1970 be verified. According to the DEIR, the system was designed with an MAOP of 610 pounds per square inch gauge (psig) but typically operates at lower pressure. Specific project components include:

- Replacement of the Wilbur Lateral with a 12-inch diameter steel pipeline;
- Replacement of the I-495/Lowell Connector crossing with a 12-inch diameter steel pipeline using Horizontal Directional Drilling (HDD);
- Installation of a launcher and replacement of fittings at the Tewksbury Take Station;
- Replacement of a pipeline elbow near Whipple Road in Tewksbury;
- Replacement of a tie-in at the Brick Kiln Road GRS in Chelmsford;
- Installation of a receiver at the Wilbur GRS; and,

- Installation of below-ground fittings at the branch of the Doane Lateral to allow for future ILI of that line.

Replacing the existing sections with small diameter pipe with a consistent 12-inch diameter pipeline will allow the system to operate at higher pressure and will provide additional capacity to meet forecasted demand for gas through the year 2040. The project is anticipated be completed by November 2020 and so that ILI inspection of the Tewksbury Mainline and Wilbur Lateral can take place by October 2021.

Project Site

The new pipeline and other structures will generally be installed at specific locations within the Proponent's right-of-way (ROW). The Tewksbury Take Station is located on Chapman Road near Tewksbury's southwestern boundary with Billerica. It is located in a low-density residential neighborhood and is bordered to the east by Long Pond and associated open space. The proposed launcher will be constructed within the fence line of the facility. The site of the proposed pipeline elbow on Whipple Road is located approximately 1,000 feet north of the Tewksbury Take Station in the same residential neighborhood. The elbow will be installed within a part of the ROW that passes behind homes located along Chapman Road near its intersection with Whipple Road and adjacent to a home located on Whipple Road. The work area will extend in part beyond the ROW onto the Whipple Road residential property. The Brick Kiln GRS is located off Brick Kiln Road in Chelmsford. It is located in a primarily residential area but is bordered to the south by a large parcel delivery facility. The work area for the replacement of the pipeline tie-in encompasses the GRS site and areas adjacent to the pipeline.

The majority of the project activity, including pipeline replacement, will occur along an approximately 2.25-mile long segment of the pipeline ROW from the western end of the Tewksbury Mainline southeast of the I-495/Lowell Connector interchange to the western terminus of the Wilbur Lateral at the Wilbur GRS. A 1,215-linear foot section of 12-inch diameter pipeline will be installed under the highway using HDD. The staging area for the entry point of the HDD will be in the parking lot of a commercial property located south of Riverneck Road in Chelmsford. The HDD will proceed in a northwest direction with an exit point in the parking lot of a movie theater on Reiss Avenue in Lowell, where the Wilbur Lateral branches off from the terminus of the Tewksbury Mainline.

The remainder of the replacement pipeline will be installed in an excavated trench within or adjacent to the ROW. The new pipeline location will deviate from the ROW in the movie theater parking lot to follow the edge of the pavement rather than its current route along internal roadways. At the northern edge of Reiss Avenue parking lot, the pipeline will be installed across River Meadow Brook, then continue north through paved areas across Chelmsford Street. Most of the remainder of the pipeline will be installed in Bordering Vegetated Wetlands (BVW), except for a section between Chatham Street and West Forest Street. In this section, the pipeline will be installed within or adjacent to an electric transmission line ROW crossing residential properties. An approximately 1,450-ft long section of the pipeline west of West Forest Street will be shifted up to 175 feet north of the existing gas ROW to provide clearance from the electric transmission line. The pipeline will cross the Middlesex Canal and Black Brook, then pass

through uplands adjacent to commercial properties and a golf course before terminating at the Wilbur GRS.

Environmental Impacts and Mitigation

Potential impacts are primarily associated with the installation of the new pipeline, and include wetland alteration caused by the trench excavation and construction-period impacts associated with the use of timber mats. Impacts to wetlands include: approximately 5.5 acres (240,241 sf) of BVW; 383 linear feet of Bank; 5.9 acres (255,899 sf) of Bordering Land Subject to Flooding (BLSF); 2 acres (87,819 sf) of Riverfront Area; and 3,222 square feet (0.07 acres) of Land Under Water (LUW).¹

Measures to avoid, minimize, and mitigate project impacts include the use of timber mats to prevent permanent impacts to wetland resource areas during construction, installation of erosion and stormwater best management practices (BMPs), GHG mitigation measures and development of a Traffic Management Plan (TMP).

Jurisdiction and Permitting

The project is undergoing MEPA review and is subject to a mandatory EIR pursuant to 301 CMR 11.03(3)(a)(1)(a) of the MEPA regulations because it requires State Agency Actions and will alter one or more acres of BVW (approximately 8.6 acres). The project will require a Section 401 Water Quality Certification (WQC) from the Massachusetts Department of Environmental Protection (MassDEP), an Access Permit/Trench Rider Permit from the Massachusetts Department of Transportation (MassDOT), and an Approval of Petition to Construct (M.G.L c. 164, s. 69J) from the Energy Facilities Siting Board (EFSB). It is subject to review under the May 2010 MEPA Greenhouse Gas (GHG) Emissions Policy and Protocol (GHG Policy).

The project also requires Orders of Conditions (OOC) from the Chelmsford, Lowell and Tewksbury Conservation Commissions (and, if an OOC is appealed, a Superseding Order of Conditions (SOC) from MassDEP), a Section 404 Pre-construction Notification approval by the Army Corps of Engineers under the General Permits for Massachusetts, a National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) from the Environmental Protection Agency (EPA) and review by the Massachusetts Historical Commission (MHC) pursuant to Section 106 of the National Historic Preservation Act and M.G.L. c.9, ss.26-27C (950 CMR 70-71).

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

¹ The DEIR did not provide updated estimates of the project's impacts to Bank, BLSF and Riverfront Area. The areas of impact listed in this Certificate are those provided in the ENF.

project extends to all aspects of the project that are likely, directly or indirectly, to cause Damage to the Environment as defined in the MEPA regulations.

Changes Since the Filing of the ENF

An approximately 1,450-lf section the pipeline route near West Forest Street and Marshall Street has been realigned to provide adequate clearance from the electric transmission line. The route will be located up to 175 feet north of the existing gas pipeline right-of-way. According to the Proponent, this change will also minimize BVW impacts compared to the alternative presented in the ENF.

Review of the DEIR

The DEIR was generally responsive to the Scope included in the ENF Certificate. It described the purpose of the project, provided updated project plans, described existing conditions and provided a supplemental analysis of alternative routes and construction methods. The DEIR identified environmental impacts and mitigation measures, included draft Section 61 Findings and responded to comments received on the ENF.

Alternatives Analysis

The Scope required the Proponent to provide an expanded alternatives analysis in the DEIR including routes and pipeline construction methods (e.g., HDD, pipe jacking) that would avoid and minimize direct impacts to wetland resource areas. The DEIR also identified two variations (“work-arounds”) of the Preferred Alternative that follow different routes through the large BVW located south of the Wilbur GRS.

The DEIR reviewed the seven Wilbur Lateral route alternatives previously described in the ENF denoted as Alternatives 1 (Preferred Alternative), 1A, 1B 2, 2A, 2B and 3. Alternatives 1A and 1B are variations of the Preferred Alternative that would minimize BVW impacts by installing a portion of the Wilbur Lateral in streets. Alternatives 2, 2A and 2B would follow streets northeast of the wetland area and Alternative 3 would be located within streets south of the BVW area. Alternative 2 would reduce BVW impacts to 420 sf and Alternatives 2A, 2B and 3 would avoid BVW impacts entirely, but all four of the routes are longer than the Preferred Alternative and would result in greater traffic disruption and other construction-period impacts to residential areas.

The DEIR Scope required an analysis of additional pipeline routes that avoid BVW in order to determine whether such a route existed that could minimize impacts to residential areas compared to the alternatives assessed in the ENF. The DEIR identified three additional route alternatives: Alternatives A, B and C. All three of these route alternatives proceed north from the end of the pipeline to be installed by HDD to Chelmsford Street and Stevens Street. Alternative A would continue north on Stevens Street, turn northwest onto Parker Street, follow Pine Street to Westford Street, proceed west to Stedman Street then south to the Wilbur GRS via Wilbur Street. Alternative B would deviate from the route of Alternative A by turning off Stevens Street at Marshall Avenue, then following West Forest Street, Campbell Drive and Lura Street and

rejoining Alternative A at Pine Street. Alternative C coincides with Alternative A for most of its route, but turns south off of Pine Street onto Westview Road, then travels west through BVW adjacent to the golf course to the Wilbur GRS. According to the DEIR, Alternatives A and B are feasible options but an engineering review of the feasibility of Alternative C has not been completed. The DEIR did not provide a detailed quantitative analysis of the impacts and feasibility of the alternatives. Alternatives A and B would avoid impacts to BVW and Alternative C would impact a significantly smaller area of BVW than the Preferred Alternative.

The DEIR provided a more detailed analysis of the Route 3 and Stedman Street work-around variations of the Preferred Alternative. Both of the work-arounds would diverge from the Preferred Alternative route near West Forest Street and proceed northwest within the Route 3 ROW north of the highway. The Stedman Street work-around would follow Olde Canal Drive, Stedman Street and Wilbur Street to the Wilbur GRS. The Route 3 work-around would cross Olde Canal Drive to the southern edge of the golf course, then proceed north to the Wilbur GRS. Both of the routes are longer than the Preferred Alternative, which follows a more direct path through BVW from West Forest Street to the Wilbur GRS. According to the DEIR, the Stedman Street work-around would reduce the project's BVW impacts by 70,710 sf (1.6 acres) and the Route 3 work-around would reduce BVW impacts by 61,155 sf (1.4 acres). The work-around variations will continue to be evaluated and the Proponent has noticed the variations in its EFSB proceeding.

During the review period, the Proponent provided the following table which provides a quantitative comparison of impacts of the route alternatives.

	Alt 1 – Preferred Route	Alt 1A	Alt 1B	Alt 2	Alt 2A	Alt 2B	Alt 3	Alt A	Alt B	Alt C	Stedman Workaround	Route 3 Workaround
Total Length (Mi)	2.0	3.0	2.7	3.3	3.0	3.4	2.8	3.0	3.4	3.2	2.5	2.1
Wetlands (lf)	4,049	1,569	2,902	420	0	0	0	0	0	288	3,670	3,802
Tree Clearing (ac)	4.3	2.3	6.1	4.2	0.1	0.1	1.6	0.1	0.1	3.6	3.6	5.1
Stream Crossings	2	2	3	2	2	2	2	2	2	2	2	2
Middlesex Canal Crossing	Yes	No	Yes	No	No	No	No	No	No	Yes	Yes	Yes

Construction Methods

The DEIR also included an analysis of the use of the jack-and-bore method for stream crossings. The jack-and-bore method would avoid impacts to River Meadow Brook and Black Brook by boring a void below the stream bed within which a pipe could be inserted from excavated pits on either side of the stream. According to the DEIR, the use of jack-and-bore at

these crossings is not feasible because of inundated and/or saturated soil conditions that would require continuous dewatering, result in unstable excavations, and present difficult conditions for installing the pipeline segment in the correct location. In addition, the River Meadow crossing would require the prolonged use of the commercial parking lots on either side of the brook. The DEIR did not review the feasibility of using HDD for these crossings.

The DEIR evaluated the feasibility of using HDD to avoid impacts to the large BVW area adjacent to Route 3. This technique would require a large staging area at the HDD exit point at the south end of the installation. The only sufficient space available for the staging area would include the southern end of the BVW because the potential staging areas at the northern end are limited by dense development, the golf course and a wetland area. According to the DEIR, HDD operations would last for several months, during which time the residential and commercial uses at the entry and exit locations would be subject to significant noise impacts. In addition, the Proponent would be required to obtain temporary and permanent rights from adjacent property owners. For these reasons, and because the staging areas would impact BVW, the DEIR concluded that using HDD to install the pipeline across the BVW is not feasible.

In the ENF, the Proponent evaluated an alternative that would replace the 6-inch and 8-inch pipe under the I-495/Lowell Connector intersection (a total of 174 feet of pipeline) with a 6-inch diameter pipe. The Wilbur Lateral would not be replaced and BVW impacts would be avoided. This alternative was rejected in part because it would not increase pipeline and improve the reliability of the system during peak demand periods. The DEIR considered a variation of this alternative that would replace the 6-inch and 8-inch pipeline under the highway intersection with a 12-inch diameter pipe and add a 12-inch pig receiver and a 6-inch pig launcher. This would allow the 6-inch Wilbur Lateral north of the intersection to be inspected separately. According to the DEIR, this alternative would significantly minimize BVW impacts, but would require the additional launcher and receiver structures to be located on private property. In addition, the existing Wilbur Lateral would require upgrades in order to accommodate ILI by a 6-inch pig.

The Preferred Alternative route is 1.99 miles long, which is significantly shorter than any of the other routes. It will have greater wetland impacts than the other alternatives, but will avoid construction-period disruptions in residential and commercial areas, avoid sensitive receptors such as schools, and minimize traffic impacts.

Wetlands and Water Quality

The DEIR provided a detailed description of wetland resource areas, the nature and extent of the project's impacts on wetlands and identified measures to minimize and mitigate impacts. The project will impact approximately 5.5 acres of BVW; 383 lf of Bank, 5.9 acres of BLSF, 2 acres of Riverfront Area; and 0.07 acres) of LUW. Impacts to BVW have been reduced by 3.1 acres since the ENF due to realignment of a portion of the Preferred Alternative, refinements to the layout of construction mats, and revised estimates based on more accurate resource area delineations and work space requirements.

Project activities in wetland resource areas will occur within a 75-ft wide Temporary Work Space, which will be covered by construction mats to prevent direct impacts to wetlands and provide for a stable platform for construction equipment. In addition to the mats, impacts to wetlands will be caused by excavating a 5-ft wide trench for the new pipeline and removing trees and other vegetation in the ROW. Permanent impacts to 24,527 sf of BVW are associated with the conversion of forested wetlands to a scrub shrub wetland type within a 20-ft wide area on either side of the pipeline. According to the DEIR, impacts due to trenching, construction mats and removal of herbaceous vegetation will be temporary in nature. In-situ restoration of BVW will include backfilling the trench with the excavated wetland soils, regrading any areas where rutting or soil compaction occurred, mulching disturbed areas, and adding native seed or allowing the existing root and seed stock to regrow.

The dam and pump crossing method will be used to install pipeline across streams. Temporary dams will be placed upstream and downstream of the crossing and pumps will transfer stream flow around the work area to the downstream side. The area between the dams will be dewatered to allow for trench excavation and pipeline installation. The stream bed will be restored to pre-construction conditions before the dams are removed. The construction method for the Middlesex Canal crossing will be determined in consultation with MHC.

New sections of pipeline will undergo hydrostatic testing to verify that they are capable of safely withstanding the pressurized gas. According to the DEIR, a total of 82,000 gallons of municipal water will be required for the tests, including 22,000 gallons for two tests of the Highway crossing section (11,000 gallons of water per test) and 60,000 gallons for one test of the Wilbur Lateral. Before water is added to the pipeline, it will be cleaned and emptied of air using pigs. Water will be used to pressurize the pipeline to one and a half times the MAOP for eight hours. The water will then be removed from the pipeline, tested to ensure it meets water quality standards and either discharged to a vegetated upland location or stored in tanks for off-site disposal.

Transportation

The project will require an Access Permit from MassDOT for the HDD crossing of the I-495/Lowell Connector interchange, of which 1,342 ft will be within MassDOT's ROW. The Preferred Alternative includes an approximately 0.14 mile-long section located in the Route 3 ROW north of Chelmsford Street that includes a 154-ft long section of the pipeline and will require tree clearing in a 38,584-sf area. The work-arounds would traverse another section of the Route 3 ROW north of the roadway that would require additional clearing. The project will not directly impact any roadways under MassDOT's jurisdiction.

The DEIR provided a Traffic Control Plan showing a proposed detour route and signage that will be implemented when the pipeline is installed across Chelmsford Street. The DEIR included a commitment to develop a Traffic Management Plan in coordination with MassDOT and the City of Lowell to ensure that access for emergency vehicles will be maintained, address the scheduling deliveries of equipment and materials, review lane restrictions, closures and detours and provide public notice of travel restrictions.

Greenhouse Gas Emissions

This project is subject to review under the May 5, 2010 MEPA GHG Policy. The DEIR included a GHG analysis to address emissions associated with the construction, commissioning and operation of the new pipeline and decommissioning of the portion of the existing pipeline to be abandoned. These activities release methane (CH₄), which is the primary component of natural gas and a potent greenhouse gas. For this analysis, emissions of CH₄ were converted to carbon dioxide equivalents (CO₂e) for comparison to emissions of CO₂. The analysis reviewed the GHG emissions associated with the following activities:

- Commissioning: emissions due to the release of gas when the new pipeline is purged, after hydrostatic pressure testing, to provide 100 percent natural gas in the main
- Tie-in: emissions due to the release of gas associated with new connections to the distribution system, including proposed tie-ins for the launcher at the Tewksbury Take Station, the receiver at the Wilbur GRS, the elbow at Whipple Road, the tee at the Brick Kiln GRS, and both ends of the highway crossing;
- Decommissioning: emissions due to the one-time release of gas from the existing pipeline before it is deactivated and abandoned;
- Construction: short-term emissions from diesel and gasoline construction equipment and vehicles and private vehicles driven by construction workers to the site;
- Fugitive emissions from the pipeline during normal operations; and,
- Emissions that may occur during long-term maintenance procedures, such as inspections.

To minimize the volume of gas vented during tie-ins and decommissioning, the project will employ hot-tapping and stopping techniques and use draw down compressors to re-route gas from the pipe to be replaced into the adjacent low-pressure system. The project will avoid fugitive emissions through the design of the pipeline and fittings, annual leak surveys and regular patrols of the pipeline, and monitoring pressure changes on the pipeline. Releases of methane during inspections will be minimized using draw down compressors. The mitigation measures will reduce one-time emissions of CO₂e during commissioning, decommissioning and tie-ins from 90.29 tons to 27.68 tons (approximately 70 percent). Methane emissions from each inspection will be reduced from 0.34 tons per inspection to 0.06 tons (approximately 80 percent). The DEIR did not quantify emissions of CO₂ from construction vehicles, but included commitments to minimize GHG emissions during construction by restricting vehicle idling, using ultra low sulfur diesel (ULSD) fuel and by installing emissions control devices, such as oxidation catalysts, on construction vehicles.

Climate Change Resiliency

The DEIR reviewed projected climate conditions for the Merrimack River Basin published in the EEA *Massachusetts Statewide and Major Basins Climate Change Projections Report*. The average annual temperature is expected to rise by 3.9 to 10.0 degrees Fahrenheit (F) by 2090, including 15 to 74 more days with temperatures over 90 F. According to the DEIR, higher temperatures may accelerate damage and aging of the pipeline and associated structures. The average annual rainfall is projected to increase by 0.9 to 7.6 inches by 2090, including more frequent large precipitation events; increased flooding events may damage the gas distribution

system and caused increased disruptions in gas service to consumers. According to the DEIR, potential impacts from climate change will be minimized by burying the pipeline, coating the pipe with concrete and avoiding routes through open water.

Historic and Archaeological Resources

The Wilbur Lateral crosses the Middlesex Canal, which is listed in the State Register of Historic Places and the Inventory of Historical and Archaeological Assets of the Commonwealth (Inventory). According to the DEIR, seven historic districts listed in the National Register of Historic Places and two archaeological sites listed in the Inventory are associated with the Middlesex Canal. The DEIR stated that one additional archaeological site and three pre-contact sites listed in the Inventory are located within one-half mile of the Preferred Alternative route.

The project will be reviewed by MHC in compliance with Section 106 of the National Historic Preservation Act of 1966. According to MHC, the Proponent must conduct an intensive (locational) archaeological survey of the area to be impacted by the project. The results of the survey will be used to identify measures to avoid, minimize and mitigate impacts to archaeological resources.

Construction

The DEIR included a discussion of construction period impacts, including erosion and sedimentation, air quality, solid waste disposal, water quality and water supply protection, and construction management and traffic. The Proponent will prepare an Environmental Construction Management Plan (ECMP) that will identify all necessary mitigation measures to eliminate or minimize these impacts. Erosion and sedimentation controls will be installed around work areas in accordance with a Stormwater Pollution Prevention Plan (SWPPP) to be developed as part of the project's NPDES CGP. The Proponent will require contractors to use Ultra Low Sulfur Diesel (ULSD) fuel in all off-road construction equipment and to comply with EPA emissions standards. All construction activities will comply with the MassDEP Air Pollution Control Regulations at 310 CMR 7.02 (Plan Approval and Emission Limitations) and 310 CMR 7.09 (Dust, Odor, Construction, and Demolition), and with the Massachusetts Idling regulation at 310 CMR 7.11.

Conclusion

Based on review of the DEIR, consultation with State Agencies and comment letters, I have determined that the DEIR adequately and properly complies with MEPA. The DEIR was generally responsive to the Scope issued in the ENF Certificate and provided a more detailed description of the project, its impacts and mitigation measures. The FEIR should be prepared consistent with the following Scope.

SCOPE

General

The FEIR should follow Section 11.07 of the MEPA regulations for outline and content, as modified by this Scope. It should respond to comments received on the DEIR and, as appropriate, identify and commit to specific environmental mitigation measures, and provide revised draft Section 61 Findings.

The FEIR should identify any changes to the project since filing the DEIR. The FEIR should include existing conditions and site plans at a legible scale to provide context for the Scope and Response to Comments. It should provide updated estimates of impacts to all wetland resource areas and identify proposed mitigation. The FEIR should provide a brief description and analysis of applicable statutory and regulatory standards and requirements, and a description of how the project will meet those standards. The FEIR should include a list of required State Agency Permits, Financial Assistance, or other State approvals, as well as any local or federal permitting.

The FEIR should address how the additional safety protocols established by the DPU as well as the ongoing evaluation of pipeline safety will alter the planning, design, implementation and maintenance of the project including measures to be undertaken during the tie-in of any new components to ensure that over-pressurization of the system will not occur.

Alternatives Analysis

The DEIR included an analysis of alternative routes for the Wilbur Lateral, including alternatives previously identified in the ENF, three additional alternatives developed in response to the Scope and the two work-arounds. It provided a quantitative comparison of the ENF alternatives and discussed their feasibility. As noted above, the DEIR provided limited information about the impacts of the work-arounds and did not provide a quantitative analysis of the impacts of the three new alternative routes. The FEIR should include the data provided during the review period that compared the wetlands impacts of the route alternatives. To the extent that information is available, the FEIR should provide a quantitative assessment of the impacts associated with the use of HDD to cross streams and BVW. It should compare construction-period impacts of each group of alternatives, including noise and traffic impacts. The FEIR should provide a discussion of the feasibility of the alternatives with respect to achieving project goals. It should provide an update on the alternatives reviewed under the EFSB proceedings.

Wetlands

As requested by MassDEP, the FEIR should include additional details on work area requirements. It should review potential means of minimizing impacts to BVW by reducing the construction ROW and use of construction mats. The FEIR should provide a more detailed

description of mitigation for permanent wetland impacts and include commitments for these measures in the draft Section 61 Findings.

The FEIR should provide additional details regarding the disposal of water used for hydrostatic testing. If the Proponent intends to discharge the water on-site, the FEIR should review the water quality standards that would apply to the discharge and identify potential areas where the discharge could occur and mitigation measures to prevent scour and ponding. The FEIR should review any additional disposal options under consideration, such as discharge into municipal stormwater or sanitary sewer systems. It should provide an update on the alternatives reviewed under the EFSB proceedings.

Climate Change

According to the DEIR, the Proponent does not expect fugitive emissions to occur and therefore did not quantify any such GHG emissions. The FEIR should review and quantify emissions from non-routine operations of the pipeline, such as long-term maintenance procedures including in-line inspections or unplanned blowdowns when a section of pipeline must be vented for maintenance or repair purposes.

A significant portion of the Wilbur Lateral is located within the 100-year floodplain. The FEIR should evaluate flood conditions under future climate change conditions, including increased precipitation, and identify any resiliency features that may be incorporated into the design of the pipeline or other structures. The FEIR should discuss any resiliency benefits the project will provide to the community.

Historic Resources

The FEIR should provide an update on any consultation with MHC regarding the method for crossing the Middlesex Canal. It should summarize the results of the archaeological survey and identify any mitigation measures required to avoid or minimize impacts to cultural resources.

Mitigation and Draft Section 61 Findings

The FEIR should include a section that summarizes proposed mitigation measures and provide draft Section 61 Findings for each State Agency Action. It should contain clear commitments to implement these mitigation measures, estimate the individual costs of each proposed measure, identify the parties responsible for implementation, and contain a schedule for implementation.

In order to ensure that all GHG emissions reduction measures adopted by the Proponent as the Preferred Alternative are actually constructed or performed by the Proponent, the Secretary requires proponents to provide a self-certification to the MEPA Office indicating that all of the required mitigation measures, or their equivalent, have been completed. The commitment to provide this self-certification in the manner outlined above should be incorporated into the draft Section 61 Findings included in the DEIR.

Responses to Comments

The FEIR 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 DEIR should include direct responses to comments to the extent that they are within MEPA jurisdiction. This directive is not intended, and shall not be construed, to enlarge the scope of the DEIR beyond what has been expressly identified in this Certificate.

Circulation

The Proponent should circulate the FEIR to those parties who commented on the ENF or the DEIR and 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. A copy of the FEIR should be made available for review at the Chelmsford, Lowell and Tewksbury public libraries.



November 16, 2018

Date

Matthew A. Beaton

Comments received:

10/19/2018 Massachusetts Historical Commission (MHC)
 11/09/2018 Massachusetts Department of Environmental Protection (MassDEP)/Northeast
 Regional Office (NERO)
 11/09/2018 Cathy Kristofferson
 11/09/2018 Northern Middlesex Council of Governments (NMCOG)

MAB/AJS/ajs



RECEIVED

OCT 22 2018

MEPA

The Commonwealth of Massachusetts

October 19, 2018 William Francis Galvin, Secretary of the Commonwealth

Massachusetts Historical Commission

Secretary Matthew A. Beaton
Executive Office of Environmental Affairs
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100 Cambridge Street, Suite 900
Boston MA 02114

RE: National Grid Colonial Gas Company Lowell Area Gas Modernization Project, Lowell, Chelmsford, and Tewksbury. MHC #RC.63566. NAE-2017-03061. EEA #15786.

Dear Secretary Beaton:

Staff of the Massachusetts Historical Commission (MHC) have reviewed additional information submitted for the project referenced above. The information includes the Draft Environmental Impact Report (DEIR), the corrected Figure 3-4 for the DEIR showing alternative routes, the "Cultural Resources Due Diligence Review and Archaeological Sensitivity Assessment: National Grid's Lowell Area Gas Modernization Project, Tewksbury, Chelmsford, and Lowell, MA," dated July 16, 2018 and prepared by Commonwealth Heritage Group, Inc. (CHG), and information submitted by the US Army Corps of Engineers with project plans dated September 11, 2018.

The CHG study identified historic and archaeological resources and archaeologically sensitive locations within the area of potential impact for the then-proposed preferred alternative route. The DEIR (page 5) indicates that the location of the proposed preferred route has been modified subsequent to the cultural resources study conducted by CHG. The DEIR (Appendix A) includes revised project plans dated September 17, 2018. The DEIR (Chapter 3) includes an analysis of alternative project routes and construction methods. The alternative project routes are located within or adjacent to other historic and archaeological resources, including 19-MD-989 and other sections of the Middlesex Canal.

The MHC requests that an intensive (locational) archaeological survey (950 CMR 70) be conducted for the archaeologically sensitive portions of the selected project impact areas. The current project plans, as well as any other updated project information for locations where impacts to the ground surface or subsurface are proposed, should be used to develop an effective research design and methodology for the archaeological survey. The scope of the survey should include a proposal for archaeological monitoring and recording at locations where buried portions of the historic Middlesex Canal may be affected by the project. The results of the archaeological survey will provide information to consult to avoid, minimize, or mitigate any project-related adverse effects to significant archaeological resources. The MHC looks forward to reviewing a State Archaeologist's permit application (950 CMR 70) for the archaeological survey.

These comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act of 1966 as amended (36 CFR 800), MGL c. 9, ss. 26-27C (950 CMR 70-71), and MEPA (301 CMR 11).

Sincerely,

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

xc: see attached

xc:

Darrell Oakley, National Grid

Barbara Newman, US Army Corps of Engineers, attn. Mike Wierbonics

Martin G. Dudek, Commonwealth Heritage Group

Sióna Patisteas, VHB

Jessica A. Wall, Anderson & Kreiger LLP

Middlesex Canal Commission – Northern Middlesex Council of Governments

Middlesex Canal Association

Lowell Historic Board

Chelmsford Historical Commission

Tewksbury Historical Commission



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Northeast Regional Office • 205B Lowell Street, Wilmington MA 01887 • 978-694-3200

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Matthew A. Beaton
Secretary

Martin Suuberg
Commissioner

November 09, 2018

Matthew A. Beaton, Secretary
Executive Office of
Energy & Environmental Affairs
100 Cambridge Street
Boston MA, 02114

RE: Lowell Area Gas Modernization Project
Lowell, Chelmsford and Tewksbury
EEA #15786

Attn: MEPA Unit

Dear Secretary Beaton:

The Department of Environmental Protection Northeast Regional Office (MassDEP-NERO) has reviewed the Draft Environmental Impact Report (DEIR) submitted by Colonial Gas Company d/b/a National Grid (the “Proponent”), to replace portions of an existing natural gas pipeline system serving the Lowell area with a new, larger diameter pipeline. MassDEP provides the following comments.

Colonial Gas Company d/b/a National Grid has filed a Draft Environmental Impact Report (DEIR) for the proposed Lowell Area Gas Modernization Project in Lowell, Tewksbury and Chelmsford, MA. The replacement of portions of an existing gas pipeline will be replaced with a new, larger diameter pipe to facilitate the use of In-Line-Inspection (ILI) equipment as will be required by forthcoming federal requirements. The project will require filing of a mandatory EIR due to exceedances of MEPA thresholds.

Wetlands

While environmental impacts associated with the project can be categorized as relatively limited and temporary due to its location in an existing maintained right-of-way corridor, they are

significant. The impacts to Bordering Vegetated Wetlands (BVW) resulting from retrenching and reinstallation of new pipeline, including impacts from swamp mats, were presented in the ENF as in excess of 375,000 square feet. This number results from calculating the impacts to wetlands from a 75-foot wide corridor through the existing alignment. The DEIR has revised this number down to approximately 364,000 square feet (see Table 1-2). A majority of the proposed wetlands impacts associated with the Project are temporary and will occur in previously disturbed or maintained areas such as existing cleared ROWs. However, within that total, a projected impact to forested wetlands totaling approximately 25,000 square feet, due to “Vegetation Clearing-Conversion of Cover Type,” is proposed. As opposed to the vegetation height requirements in electrical alignments, these forested wetlands will be allowed to grow back to full maturity, but it is still anticipated that a significant conversion in cover type will result. While the DEIR anticipates the need to mitigate these impacts via monitoring and the payment of an in-lieu fee to the USACE, it appears that no consideration has been given to providing further mitigation for these impacts, such as restoration of other degraded or previously filled wetlands in the project alignment or the project area. This option should be further explored in the FEIR.

In comments on the ENF, MassDEP asked that the applicant consider alternatives that could minimize the width of the ROW work area through some smaller sections of the project alignment through BVW. This appears to have been considered in the Draft EIR to a nominal degree. It does appear that certain sections of the ROW will be 50 feet, but this appears to be predetermined due to spatial limitations rather than minimization of wetlands impacts. The possibility of using a 50 foot ROW in portions of the work area where there are impacts to wetlands should be further considered.

MassDEP also requested that the methodology for the two stream crossings in Lowell, one at Black Brook and the other at River Meadow Brook in the vicinity of Cross Point, be further detailed. The applicant has chosen the open cut method and explained in detail why this alternative was chosen over the jack and bore method. The DEIR also states that the open cut method was chosen at both locations over the Horizontal Direction Drilling (HDD) method, but as compared to the analysis for the jack and bore method, the reasons for eliminating the HDD option are not detailed as effectively. This should be further discussed in the FEIR.

One of the conclusions drawn in the alternatives analyses conclusion in section 3.10 should be further explained; specifically, that methodologies using HDD in the alignments under wetlands and waterways would have resulted in less impacts to wetlands but were rejected in large part because of noise considerations in the residential area surrounding the Golf Club north of Route 110. Can the project be scheduled so that noise impact can be minimized to the residential areas during construction? This should be further analyzed in the FEIR.

The DEIR acknowledges the need for permits under the Wetlands Protection Act and that a major Water Quality Certification (WQC) from MassDEP will be required.

The MassDEP Northeast Regional Office appreciates the opportunity to comment on this proposed project. Please contact Rachel.Freed@mass.gov or at (978) 694-3258 on wetlands issues. If you have any general questions regarding these comments, please contact me at John.D.Viola@mass.gov or at (978) 694-3304.

Sincerely,

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.

John D. Viola
Deputy Regional Director

cc: Brona Simon, Massachusetts Historical Commission
Eric Worrall, Rachel Freed, Philip DiPietro, MassDEP-NERO

November 9, 2018

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

Via Email: Alexander.Strysky@state.ma.us

Re: EEA #15786, Draft Environmental Impact Report, Lowell Area Gas Modernization Project

Dear Secretary Beaton,

I respectfully submit the enclosed comments on the Draft Environmental Impact Report (“DEIR”) for the Colonial Gas Company d/b/a National Grid (the “Company”) proposed Lowell Area Gas Modernization Project (the “Project”) in Lowell, Chelmsford, and Tewksbury, Massachusetts (EEA No. 15786).

The Company is proposing to upgrade its Tewksbury Mainline and Wilbur Lateral to accommodate federal requirements of In-Line Inspection (“ILI”) while conveniently quadrupling the capacity of the Wilbur Lateral to provide for potential increases in future demand. The Company plans to replace the entire existing Wilbur Lateral with approximately 2 miles of 12” pipeline, to horizontal directional drill under I-495/Lowell Connector, to install pigging launching and receiving equipment, along with elbows, tie-ins and various other components of the Tewksbury Mainline. To construct their Preferred Route, the Company states they will impact approximately 8.6 acres (376,091 sf) of BVW; 383 linear feet of Bank; 5.9 acres (255,899 sf) of Bordering Land Subject to Flooding (BLSF); 2 acres (87,819 sf) of Riverfront Area; and 5,026 square feet (0.1 acres) of Land Under Water (LUW). These impacts are the result of crossing multiple streams, the historic Middlesex Canal, and wet trenching through a very large wetland.

Wetland impacts

The Company admits that its preferred route has the greatest wetland impacts, yet has chosen the route regardless of other much less impactful, as well as less costly, options which accomplish the stated ILI goals. Section 3.4.1 Alternative 2 Highway Crossing of the DEIR describes an adequate alternative which accomplishes the need for the Project while avoiding a great deal of the wetland impacts by not replacing the entire Wilbur Lateral with quadruple-capacity 12” pipe. Not replacing the Wilbur Lateral will also avoid impacts to the 100-year floodplain as mapped by the Federal Emergency Management Agency (“FEMA”) and the resulting potential for future enhanced flood impacts to Project abutters.

The described Best Management Practice of construction matting does not prevent unnecessary disturbance of wetland vegetation and soil but actually serves to compact soils and provide opportunity for wetland violations when mud from vehicles dries and is swept or blown off the mats into the wetland resource areas. Additionally, wetland vegetation is more often crushed under the weight of construction equipment travelling on the construction mats. If

this Project is allowed to move forward, please require mandatory time of year (“TOY”) restrictions for the Wilbur Lateral replacement, if not for the entire Project, to guarantee all work is done during adequately frozen conditions.

Temporary impacts actually permanent

The Proposed Route has the second highest amount of tree clearing required for construction - clearing which is required primarily for Temporary Work Space. Clear cutting trees for temporary work areas should be avoided as much as possible. How will the cleared area be “encouraged to regenerate to forest?” The Company should be more of an active participant in the regeneration through stipulated requirements to replant mature native trees and shrubs throughout the temporary work space areas. Waiting around for mature trees to regenerate from existing root and seed stock is not acceptable.

Impacts to wetlands during the construction phase which include clear-cutting trees, “conversion” of forested wetland to scrub-shrub wetland, are dismissed by the Company as “temporary in nature.” In reality, these impacts are more likely permanent because the mature trees, forested wetlands, etc. will not be restored to their original condition. The Company, in fact, offers nothing to promote regeneration, documenting that “80 percent of the cleared areas will be left to reforest” all on their own.

Please require the Company to actively mitigate the conversions and stark results of clearcutting should the Preferred Route option be allowed to move forward.

Avoidance

Section 3.4.1 of the DEIR describes “Alternative 2 Highway Crossing,” which would avoid a great deal of the wetland impacts of the Company’s chosen Preferred Route. Avoidance is the first and best choice for environmental protection. Please require the Company to avoid wetland impact to the greatest extent possible.

Mitigation

Specific details of mitigation are left in the DEIR to “be provided at a later date.” Please require the Company to include these details in the Final EIR.

Spread of invasives

Table 1-2 of the DEIR, “Summary of Environmental Impacts,” shows Temporary Wetland Alterations of 339,088 sq. ft. by the construction processes. Please require the Company to include details of how they will prevent these areas impacted by trenching and vegetation clearing from being overrun by invasive species such as Purple Loosestrife and Phragmites.

Refueling

The Company states that “To the extent practicable, refueling or storage of construction equipment will not be permitted within 100 feet of wetland resource areas. If it is not feasible to relocate machinery during continuous operations, refueling will take place over a containment basin to prevent inadvertent spills into wetland resource areas. Should it be necessary to use fuel-powered pumps for dewatering purposes within

wetland resource areas, they will be placed within a secondary containment basin.” At the EFSB hearing on October 2, 2018 we learned that the “containment basin” is actually a “kiddy [sic] pool.”¹ Please require the Company to specify an actual containment basin manufactured for construction purposes.

Greenhouse Gas Emissions

By choosing the Preferred Route which expands all pipes to 12”, the Company accomplishes its stated “additional” goal to “to address forecasted capacity needs in the area” is in contradiction to the Commonwealth of Massachusetts Global Warming Solutions Act (GWSA) mandates, which require greenhouse gas emission reductions, not increases. See *Kain v. DEP*, 474 Mass. 278 (2016) (compelling DEP to adopt regulations that “impose a limit on [greenhouse gas] emissions that may be released, limit the aggregate emissions released from each group of regulated sources or categories of sources, set emission limits for each year, and set limits that decline on an annual basis.”)

The Company claims “No GHG emissions are expected to be released as fugitive emissions during normal operation of the Project because the pipelines will be constructed and monitored to maintain a zero leak rate.” Please require the Company to specify how they will guarantee this result.

All “venting and purging” operations described by the Company for the Project must be eliminated, not just left as “could be reduced.” Please require the Company to capture all emissions resulting from venting and purging operations.

Hydrostatic test water disposal

The DEIR states the hydrostatic test water will either be discharged on an appropriate upland or hauled off to wastewater treatment, but at the EFSB hearing on October 2, 2018,² the Company suggested it may dump the test water into the nearest storm sewer system with no concern for testing nor for what the waterbody is into which that storm drain may empty. How will the hydrostatic test water be tested? As we saw recently in Agawam and Sandisfield, hydrostatic test water becomes too contaminated to discharge to an upland for filtration. It should never be discharged directly to a storm drain. Please require the Company to include details of water contamination testing and environmentally safe disposal options.

Thank you for your consideration of these comments.

Respectfully submitted,

Cathy Kristofferson
244 Allen Road
Ashby, MA 01431
cathy.kristofferson@gmail.com

¹ oct02 efsb 18-01, dpu 18-30 NGRID Vol 3.pdf, transcript page 333

² Id, transcript page 346.



Northern Middlesex Council of Governments

November 9, 2018

Matthew A. Beaton, Secretary
Executive Office of Energy and Environmental Affairs
Attention: MEPA Office
Alex Strycky: EOEAA # 15786
100 Cambridge Street, Suite 900
Boston, MA 02114-2509

A Multi-Disciplinary
Regional Planning
Agency Serving:

Billerica
Chelmsford
Dracut
Dunstable
Lowell
Pepperell
Tewksbury
Tyngsborough
Westford

RE: EOEAA #15786/NMCOG #665 –Lowell Area Gas Modernization Project, Lowell, Chelmsford and Tewksbury

Dear Secretary Beaton:

The Northern Middlesex Council of Governments (NMCOG) has reviewed the Draft Environmental Impact Report for the Lowell Area Gas Modernization Project. The proposed project would replace an existing 6-inch to 8-inch gas pipeline with a new, larger diameter 12-inch pipeline to accommodate the use of In-Line-Inspection (ILI) equipment. In-line inspection (ILI) equipment will be necessary to comply with company policy and forthcoming federal regulatory requirements. The project spans three communities: Lowell, Chelmsford and Tewksbury and extends for approximately 2.4 miles.

This project triggers MEPA review by exceeding sections 301 CMR 11.03 (3)(a)(1)(a) alteration of one or more acres of salt marsh or bordering vegetated wetland and 11.03 (10)(b)(1) demolition of all or any exterior part of any Historic Structure listed in or located in any Historic District listed in the State Register of Historic Places or the Inventory of Historic and Archaeological Assets of the Commonwealth. Other required permits include:

- Approval under MGL c.164 Section 69J and MGL c.40A Section 3/Massachusetts Historical Commission project notification form;
- Mass DOT Highway Access permit/trench rider permit;
- 401 Water Quality Certification from Mass DEP;
- NPDES general permit;
- Section 404; and
- MGL c.131, Section 40 and 40A

The project consists of three segments: (1) the Tewksbury mainline; (2) the Wilbur lateral; and (3) the Doane lateral. The line was originally constructed in 1954 and several portions have been replaced over the years. The Tewksbury main line was last inspected in 2012, while the Wilbur lateral was inspected in 2014. The system serves 46,700 customers in the communities of Chelmsford, Dracut, Dunstable, Lowell, Pepperell, Tyngsborough and Westford.

Pat Wojtas
Chair

Beverly A. Woods
Executive Director

40 Church Street
Suite 200
Lowell, MA
01852-2686

TEL: (978) 454-8021

FAX: (978) 454-8023

www.nmcog.org

Since the filing of the ENF, the proposed alignment has been modified north of Chelmsford Street to maintain adequate clearance from electric transmission lines. Approximately 1,450 linear feet of the route near West Forest Street and Marshall Street now diverges up to 175 feet from the existing gas pipeline right-of-way, where it parallels the NEP right-of-way. According to the proponent, there are no additional environmental impacts associated with the route change.

The project will cross Black Brook and River Meadow Brook via open cut construction in Lowell. In Chelmsford, the crossing of Black Brook will occur via the highway crossing horizontal direct drilling (HDD). Overall, the project will create 339,088 square feet of temporary wetland impacts and 24,527 square feet of permanent wetland impacts. The proponent has committed to mitigating permanent wetland impacts at a 1:1 ratio. The DEIR states that secondary impacts will be identified and mitigation will be detailed at a later date. Temporary impacts will be mitigated in-situ. The final EIR should provide additional detail on the secondary wetland impacts and outline appropriate mitigation measures.

In its comments on the ENF, NMCOC expressed its concerns regarding the potential impacts to the Middlesex Canal, which is listed on the National Register. The proponent has committed to working with the USACE and MHC to determine the extent of cultural and historic resources within the project limits, including the undertaking of further archaeological investigations. The DEIR states that the mitigation of adverse effects will be handled through the Section 106 review process. If possible, any adverse impacts and associated mitigation should be further described in the FEIR.

The DEIR states that hydrostatic test water will come from municipal sources via hydrants. Ultimately, the test water will be containerized in dewatering tanks. The proponent intends to work with the municipalities and adjacent property owners on the possible discharge of the test water, which will be tested before release. It should be noted that drinking water within the town of Chelmsford is provided by independent water districts not by the Town. It is suggested that the proponent reach out to the water district in terms of accessing their water supply for purposes of hydrostatic testing.

Should you have any questions regarding the NMCOC staff comments please feel free to contact me directly at (978) 454-8021, ext. 120.

Sincerely,



Beverly Woods
Executive Director

cc: Lowell: City Manager
 Public Works Director

City Engineer
City Council
Director of Planning & Development
Planning Board
Department of Development Services
Conservation Commission
Historic Board
Board of Health
NMCOG Councilors

Tewksbury: Town Manager
Public Works Director
Town Engineer
Board of Selectmen
Director of Community Development
Planning Board
Conservation Commission
Board of Health
NMCOG Councilors

cc: Chelmsford: Town Manager
Board of Selectmen
Public Works Director
Town Engineer
Planning Board
Community Development Director
Conservation Commission
Historical Commission
Board of Health
NMCOG Councilors

REQUEST FOR MEPA REVIEW COMMENTS

Distributed to:

Lowell City Council, City Manager, Director of Planning and Development, Planning Board, Department of Development Services, Public Works Director, City Engineer, Conservation Commission, Historic Board, Board of Health, NMCOG Councilors, and Lowell Regional Wastewater Utility Director

Chelmsford Board of Selectmen, Town Manager, Planning Board, Community Development Director, Town Engineer, Public Works Director, Conservation Commission, Historical Commission, Board of Health and NMCOG Councilors

Tewksbury Board of Selectmen, Town Manager, Planning Board, Town Engineer, Public Works Director, Conservation Commission, Director of Community Development, Historical Commission, Director of Public Health and NMCOG Councilors

In accordance with the Massachusetts Environmental Policy Act (MEPA) and its corresponding regulations, the Northern Middlesex Council of Governments (NMCOG) has received a Draft Environmental Impact Report (DEIR) for the following project:

Lowell Area Gas Modernization Project– This project involves the replacement of portions of an existing natural gas pipeline system with a larger diameter pipeline for the usage of in-line inspection (ILI) equipment to comply with company policy and forthcoming federal regulatory requirements. The project spans three communities: Lowell, Chelmsford and Tewksbury.

This project triggers MEPA review by exceeding sections 301 CMR 11.03 (3)(a)(1)(a) alteration of one or more acres of salt marsh or bordering vegetated wetland and 11.03 (10)(b)(1) demolition of all or any exterior part of any Historic Structure listed in or located in any Historic District listed in the State Register of Historic Places or the Inventory of Historic and Archaeological Assets of the Commonwealth. Other required permits include:

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- *Mass DOT Highway Access permit/trench rider permit
- *401 Water Quality Certification from Mass DEP
- *MGL c.131, Section 40 and 40A

Comments pertaining to the potential extent and significance of environmental impacts directly attributable to this project are most welcome. If you wish to comment, please do so in the comment section below. For additional information, please contact NMCOG staff at (978) 454-8021.

COMMENTS DUE AT MEPA NO LATER THAN: November 9, 2018

EOEEA/NMCOG REVIEW NUMBER: EOEEA #15786/NMCOG #665

APPLICANT: Colonial Gas Company d/b/a National Grid

COMMENTS:

- No significant environmental concerns
- Need more information about the following environmental issues in order to comment: _____
- I have significant environmental concerns. (Please provide any specific comments you may have on the reverse side of this form; attach additional sheets if needed)


 Signature

TOWN MANAGER
 TOWN OF CHELMSFORD
 Title/Dept.

10-17-18
 Date

REQUEST FOR MEPA REVIEW COMMENTS

Distributed to:

Lowell City Council, City Manager, Director of Planning and Development, Planning Board, Department of Development Services, Public Works Director, City Engineer, Conservation Commission, Historic Board, Board of Health, NMCOG Councilors, and Lowell Regional Wastewater Utility Director

Chelmsford Board of Selectmen, Town Manager, Planning Board, Community Development Director, Town Engineer, Public Works Director, Conservation Commission, Historical Commission, Board of Health and NMCOG Councilors

Tewksbury Board of Selectmen, Town Manager, Planning Board, Town Engineer, Public Works Director, Conservation Commission, Director of Community Development, Historical Commission, Director of Public Health and NMCOG Councilors

In accordance with the Massachusetts Environmental Policy Act (MEPA) and its corresponding regulations, the Northern Middlesex Council of Governments (NMCOG) has received a Draft Environmental Impact Report (DEIR) for the following project:

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This project triggers MEPA review by exceeding sections 301 CMR 11.03 (3)(a)(1)(a) alteration of one or more acres of salt marsh or bordering vegetated wetland and 11.03 (10)(b)(1) demolition of all or any exterior part of any Historic Structure listed in or located in any Historic District listed in the State Register of Historic Places or the Inventory of Historic and Archaeological Assets of the Commonwealth. Other required permits include:

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- *Mass DOT Highway Access permit/trench rider permit
- *401 Water Quality Certification from Mass DEP
- *MGL c.131, Section 40 and 40A

Comments pertaining to the potential extent and significance of **environmental impacts directly attributable to this project** are most welcome. If you wish to comment, please do so in the comment section below. For additional information, please contact NMCOG staff at (978) 454-8021.

COMMENTS DUE AT MEPA NO LATER THAN: November 9, 2018

EOEEA/NMCOG REVIEW NUMBER: EOEEA #15786/NMCOG #665

APPLICANT: Colonial Gas Company d/b/a National Grid

COMMENTS:

- No significant environmental concerns
- Need more information about the following environmental issues in order to comment: _____
- I have significant environmental concerns. (Please provide any specific comments you may have on the reverse side of this form; attach additional sheets if needed)

Wendell M. [Signature]
Signature

DIRECTOR WASTEWATER / WATER 10-17-18
Title/Dept. Date