Comment ID	Comment	Response	Report Section	Page No.
General				
1	General – Include the information requested for draft Resource Reports 1 and 10 as described in our comments dated February 27, 2015. If any of the requested information cannot be included within the next draft filing, indicate when that information will subsequently be filed.	Updated responses to the comments dated February 27, 2015 are provided as Attachment 1.	N/A	N/A
2	Respond to the questions from the U.S. Environmental Protection Agency (EPA) included as Attachment A; and the U.S. Fish and Wildlife Service included as Attachment B.	Responses to the questions from the U.S. Environmental Protection Agency and the U.S. Fish and Wildlife Service are provided as Attachment 2 and 3, respectively.	N/A	N/A
3	Tennessee Gas should respond to the specific comment letters identified below: a. The Town of Northfield, Massachusetts (and attachments), filed on April 1, 2015; b. The U.S. Fish and Wildlife Service, filed on April 1, 2015; c. The Town of Amherst, New Hampshire, filed on March 24, 2015; d. The Town of Townsend, Massachusetts, filed on March, 24, 2015; e. The Town of Warwick, Massachusetts, filed on March 9, 2015; f. The Town of Mason, New Hampshire, filed on February 4, 2015; g. The Town of Ashby, Massachusetts, filed on November 23. 2014; h. The Town of Wilmington, Massachusetts, filed on January 20, 2015; i. The Town of Wilmington, Water and Sewer Department, filed on January 28, 2015; j. The Commonwealth of Massachusetts, Historical Commission, filed on May 1, 2015; k. The Heritage Commission of the Town of Richmond, New Hampshire, filed on February 6, 2015; l. The Town of Tewksbury, Massachusetts, filed on April 27, 2015; m. The U.S. Army Corps of Engineers – Upstate New York Section, filed on April 24. 2015; n. The Berkshire Planning Commission, filed on May 7, 2015; and o. The New York State Department of Environmental Conservation, filed on May 12, 2015.	Responses to the comment letters are provided in Attachment 4.	N/A	N/A
Resource Report 1 - Project Description				
1	Provide the locations and details for new compressor stations. Provide a large scale (1:3,600 or greater) plot plan identifying the proposed engine/compressor units, buildings, piping and other equipment, site property line, and nearby noise-sensitive areas (such as residences, farms, or schools). In addition, provide the mailing list for all landowners within ½ mile of the property boundary of the facility.	Locations of new compressor stations are included on 7.5-minute USGS topographic quad excerpt maps and full size aerial imagery alignments included in Volume II, Appendix E and Appendix F, respectively. Further information on the proposed modifications to the existing compressor station and the addition of new compressor stations is provided in Table 1.1-3. Draft Plot Plans are provided in Volume IV, Appendix AAA. An updated list of names and addresses of landowners whose property will be crossed by the Project is provided in the Privileged and Confidential volume of this filing.	1.1.2.2.1 Vol II, App E Vol II, App F Vol III, App AA Vol IV, App AAA	1-32 to 1-34

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2	2. General – Include all information listed in Resource Report 1 as pending or "TBD" (or include a schedule for submittal), which includes, but is not necessarily limited to: a. the location and configuration or temporary workspaces, including justifications for any within 50 feet of wetlands; b. locations and details for meter stations, mainline valves (MLV),pig launchers and receivers, cathodic protection systems, non-jurisdictional facilities, access roads, contractor yards, and other appurtenant facilities; c. updated aerial imagery for the Project area; d. updated acreages for lands affected by the Project; e. environmental construction plans (ECPs), blasting plan, and state-specific invasive species management plans; f. site-specific waterbody and wetland plans and associated crossing techniques; g. site-specific residential construction plans; h. locations and details for horizontal directional drills (HDD); i. complete alignment sheets;	**a.** Tennessee has identified locations and acreages of ATWS and is still evaluating areas where potential ATWS will be required to facilitate construction. Tennessee acknowledges that the Project will require certain ATWSs to be located within 50 feet of wetlands and waterbodies. Tennessee will adhere to the BMPs outlined in its Plan and Procedures and in the Project-specific ECPs for each state. **b.** Locations of MLVs and pig launchers/receivers are provided in Table 1.1-5. Meter Stations are provided in Table 1.1-4. Cathodic protection systems are provided in Table 1.4-1. These facilities are included on full size 7.5-minute USGS topographic maps and alignment sheets in Volume II, Appendix E and Appendix F, respectively. Locations of access roads proposed for the Project are provided in Table 8.1-6 of Resource Report 8. Locations of proposed temporary access roads identified to date are depicted on USGS topographic maps and aerial alignment sheets provided in Volume II, Appendix E and F. Acreages of contractor yards are provided in Table 8.1-7 of Resource Report 8. Locations of proposed contractor yards are depicted on the USGS topographic maps and aerial alignment sheets provided in Volume II, Appendix E and Appendix F. Updated locations of access roads and contractor yards will be provided in the October 2015 filing. **c.** Tennessee is currently completing the aerial survey and will provide updated imagery and interpretation in the Final ER. **d.** The approximate land requirements for the pipeline facilities and additional temporary workspaces (to the extent that they have been identified) are summarized in Table 1.2-1. The land requirements for the new and modified aboveground facilities, to the extent that the locations have been identified, are summarized in Table 1.2-5. The affected acreage associated with access roads are summarized in Table 8.1-6 or Resource Report 8. Approximate land requirements for contractor yards, to the extent that they have been identified, are provided in Table 8.1-7 of Resource Report 8. Land requirements will be updated, as necessary, in the October 2015 filing. **e.** Drafts of Environmental Construction Plans, including Blasting Plans and Invasive Species Management Plans, are provided in Volume II, Appendices J through N **f.** Site-specific wetland and waterbody crossing plans will be provided in the Final ER. **h.** Locations of proposed HDDs, identified as of the date of filing this resource report, are included in Table 1.3-6. Evaluations of HDD crossings are ongoing. Locations of additional HDDs, as well as site-specific plans, will be provided for these areas in the October 2015 filing. **i.** Complete alignment sheets are provided in Volume II, Appendix F.	a. 1.2.5 8.1.1.3 Vol II, App H Vol II, App J through N b. 1.1.2.2.3 8.1.3 8.1.4 Vol II, App E Vol II, App F c. TBP in Final ER d. 1.2.1 1.2.2 8.1.4 8.1.3 e. Vol II, App J-N f. TBP in Final ER g. Vol II, App P h. 1.3.2.5.2 i. Vol II, App F	a. 1-62 8b-1 through 8b-158 b. 1-39 to 1-44 8-10 8b-159 to 8b-183 c. N/A d. 1-44 to 1-47 1-56 to 1-61 8b-159 to 8b-183 e. N/A f. N/A g. N/A h. 1-86 to 1-88 i. N/A
	j. detailed construction schedule; k. location of shallow bedrock, steep slopes, and side slopes; and	j. Construction of the Project will commence after ROWs (private, federal, and state) and applicable regulatory permits and clearances have been acquired for the Project. The details regarding the anticipated 2017 and 2018 construction activities will be provided in the final ER. k. Locations of areas of shallow bedrock are provided in Table 6.2-1 of Resource Report 6. Locations of areas with steep slopes are provided in Tables 6.4-7, 6.4-8, 6.4-9, and 6.4-10 in Resources Report 6.	j. TBP in Final ER k. 6.2.1 6.4.1.5	j. N/A k. 6b-46 to 6b-60 6b-109 to 6b-152

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3	proposed modifications to the Commission's Upland Erosion Control, Revegetation, and Maintenance Plan (Plan) and Wetland and Waterbody Construction and Mitigation Procedures (Procedures) Plan and Procedures; Section 1.0 (page 1-2) – Clarify the statement that "Tennessee's current proposed pipeline alignment along utility corridors is proposed to be generally located five (5) feet outside the existing utility easement." Indicate whether the construction and permanent right-of-way would directly abut existing easements where possible. Include a descriptive table, with explanations included, for each area where a generally co-located Project segment would temporarily deviate away from other co-located utilities. Include a discussion in Table 1.1-2 regarding the status of negotiations between Tennessee Gas and the owners of other utilities regarding the potential for use of a portion of those entities' rights-of-way by Tennessee Gas during construction and/or operation.	Proposed Project-specific modifications to the Commission's Plan and Procedures are detailed in Section 1.3.2.9. Tennessee's Plan and Procedures are included in Volume II, Appendix H. Co-located pipelines are those that are laid parallel to another existing pipeline, but are not connected in any way. The current route of Tennessee's proposed NED Project, in part, is located parallel and adjacent to, and, in some cases, overlaps existing utility easements (either pipeline or electric utility). This paralleling/overlapping of easements is commonly referred to as co-location. For areas of the NED Project pipeline alignment that are proposed to be co-located with existing power line easements, Tennessee is proposing that the centerline of the pipeline will be installed generally five (5) outside the existing power line easement boundary. The proposed alignment is reflected in the proposed impacts of the Project discussed in the ER and in the attached power line co-location configurations, ROW-Config_05 and 06, included in Volume II, Appendix G. Tennessee is proposing that the temporary construction workspace for the Project for these areas of co-location would overlap the existing power line easement between 30 to 60 feet. The amount of overlap of temporary construction easements and the existing power line easements will depend ultimately on the location of the closest power line towers, which will dictate the amount of available space on the power line easement. For all areas of co-location with power line easements, Tennessee is proposing that 20 feet of the 50 foot permanent easement overlap the existing power line easement. Tennessee's proposed overlap of temporary construction workspace and permanent easement with existing power line easements will reduce environmental and landowner impacts a commensurate width outside the power line easement. Tennessee has engaged in discussions with the power companies regarding co-location and the proposed overlapping of NED Project temporary and permanent easements with that of existing power line easements and these discussions are ongoing. Tennessee may adjust the proposed centerline location of the pipeline and overlapping areas in the final ER for the Project to reflect these discussions, including appropriate mitigation for safety and operational considerations, as well as landowner and agency concerns, avoidance of sensitive environmental resources, and construction considerations.	1.3.2.9 Vol II, App H 1.0	1-91 to 1-92 1-2
4	Section 1.1.2.2.1 (page 1-13) – Confirm whether all temporary workspace needed for the modifications at Station 319 are already owned by Tennessee Gas. In addition, provide a description of work/upgrades that would take place at Station 319 due to the Planned/Proposed Susquehanna West Project.	Proposed modifications to Station 319 include upgrades to its piping systems to accommodate the incremental Project volumes to be transported through the station. Station discharge piping facilities will be modified to accommodate the proposed Loop 319-3 to the east of Station 319. Station compression hp will not be increased as a result of the proposed Project modifications. Tennessee owns the property where Station 319 is located, as well as the surrounding property (29.20 acres in total). The existing fenced area of the station will be expanded by less than 1 acre to accommodate new permanent facilities, but all facilities will be located on Tennessee-owned property. Temporary workspace ("TWS") will be used on Tennessee's existing property during construction activities, but this area will not be needed for permanent station operation.	1.1.2.2.1	1-33
5	Section 1.2.3 (page 1-48) – Include any measures to be implemented to avoid or minimize impacts on sensitive resources, such as wetlands and forest, along new access roads.	Access roads identified to date include temporary roads that have been previously utilized for prior Tennessee projects, those approved for use during construction of the Constitution Pipeline Project, and additional roads identified by Tennessee. Where possible, Tennessee will use existing roads as access roads for the Project; if no existing road is available for use, Tennessee will site new access roads away from sensitive resources to the extent practicable. Temporary soil erosion and sediment control measures will be installed along the proposed construction ROW, ATWS areas, access roads, and other work areas, as applicable, in accordance with Tennessee's Project-specific ECPs for each state.	1.2.3 1.3.1.2	1-62 1-77
6	Table 1.2-5 – Indicate whether forest, wetlands, waterbodies, or other sensitive resources would be affected by use of the contractor yards. Update draft Resource Reports 2 and 3 appropriately.	Contractor yards have been sited in previously disturbed areas including open fields, sand and gravel pits, parking lots and industrial facilities to the extent practicable. Although some wetland impacts have been reported in Resource Report 2 at the time of this filing, final selections of the most appropriate sites with the least environmental impact are still under evaluation. Impacts to wetlands, waterbodies and other sensitive areas will be avoided and minimized to the extent practicable during site evaluation.	1.2.4	1-62

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7	Section 1.3.1.13 (page 1-63) – Include a discussion regarding how ridge top areas used during construction would be restored and how post-construction contours may be different than their original condition (this may require an alternative to the FERC Plan Section V.A.5). In addition, describe the source of imported soils during restoration and plans to address potentially associated issues such as the spread of invasive plant species, soil type compatibility, and rock content. Describe any measures that would be employed to avoid allowing backfilled rock to directly contact the pipe. Update Resource Reports 6 and 7 appropriately.	Contours will be restored back to original contours as closely as possible as conditions permit. Sometimes this cannot always be achieved due to severity of slope, rock bluffs, etc. However, these areas will be restored to a contour or slope where successful restoration can be achieved. Erosion control methods such as water bars and the use of erosion control matting among others, will be installed to help achieve successful restoration. If additional material is needed, displaced material from other project locations may be imported or local area supplies may be used if necessary. In order to avoid allowing backfilled rock to directly contact the pipe, padding of the ditch and the pipe with select fill in accordance with construction and backfill specifications will be required. Also, during detailed design, various methods will be evaluated in addition to padding. This will include the use of rock shield or concrete coating to prevent rocks from contacting the pipe.	1.3.1.13	1-81
8	Section 1.3.1.14 (page 1-64) – Confirm whether Tennessee Gas would use a spray diffuser to discharge hydrostatic test water directly into a waterbody where applicable, in lieu of discharge overland based on the potential for reduced environmental impacts on the receiving waters. Indicate whether biocides or other additives would be added to hydrostatic test water. Update Resource Report 2 appropriately.	After the completion of a satisfactory test, water will be discharged to the ground through a containment structure to a vegetated upland area. In general, Tennessee will not discharge directly back into a waterbody, unless the regulating agencies would allow such a discharge. Tennessee will find a suitable upland location to discharge. No biocides or additives will be added to the hydrostatic test water.	1.3.1.14	1-81 to 1-82
9	Section 1.3.2.1 (page 1-73) – Include a discussion of any special measures that Tennessee Gas would use in rugged terrain to address potential issues such as erosion control, rocks rolling off of the right-of-way during construction, and post-restoration slips and landslides.	Tennessee will attempt to retain all soil and/or rock on the construction ROW in rugged topography using fencing, hay bales, or other containment materials such as timber mats. In the event that soil and/or rock does exit the ROW, Tennessee will retrieve the material as soon as practical either by hand or using equipment to reach out and retrieve the material. No ground disturbance will be allowed outside the certificated ROW without the necessary agency approvals. If the material has, or has the potential to, impact sensitive features, Tennessee will contact the applicable agency to determine the most appropriate course of action.	1.3.2.1	1-82 to 1-83
10	Section 1.3.2.2 (page 1-76) – Indicate whether Tennessee Gas would coordinate with local and state authorities regarding potential impacts to roads and traffic patterns, as well as a commitment to repair all road damage caused by the Project.	Tennessee will secure road permits for the installation of the pipeline crossings. Permit conditions will be adhered to for these crossing and applicable permits and Bonds required as part of the construction installation of the pipeline will be adhered to. During construction, the Contractor will be using roads to get to and from the construction site. Should specific Towns require a Road Use Agreement or traffic plans, then the contractor will be responsible for those items.	1.3.2.2	1-84 to 1-85
11	Section 1.3.2.2 (page 1-76) – Include Project-specific plans for burning slash if applicable, and detail measures to be implemented to protect forest, waterbodies, wetlands, air quality, nearby residents, and other sensitive resources in areas where slash would be burned.	Open burning will be prohibited along the ROW.	1.3.2.2	1-83
12	Section 1.3.2.3 (page 1-77) – Include in Section 1.3.2.3 a description of what equipment would be used to remove excess rock from agricultural soils and what size of rock would be removed.	Tennessee's construction contractors will utilize rock rakes or rock hounds to remove excess 4-inch or larger rock from agricultural spoils before final site restoration, unless the agricultural resource is substantially composed of 4-inch and larger rock before construction.	1.3.2.3	1-85
13	Section 1.3.2.5.2 (page 1-79) – Discuss whether Tennessee Gas, in certain circumstances, may be able to pull back an HDD section in sub-sections, thereby increasing flexibility, minimizing the false right-of-way, and precluding the requirement of pulling one continuous section.	At this time, Tennessee is still evaluating each proposed HDD crossing. Geotechnical investigation for each HDD must be completed, however, for some locations, lack of landowner access has hindered the geotechnical investigations. Therefore, the final crossing designs for each HDD have not been finalized to determine the need for false ROWs for pullback sections.	1.3.2.5.2	1-86 to 1-88
14	Section 1.3.2.6 (page 1-81) – Include a discussion regarding whether blasting would be used in areas of limestone or karst geology.	Tennessee will attempt to avoid all karst areas during the routing and construction phases of the Project. The Project-specific ECPs include a Blasting Management Plan which details measures for preserving karst geology in the event they are encountered.	Vol II, App J through N, Attachment J8 through N8	N/A
15	Section 1.3.2.7 (page 1-82) – Evaluate the feasibility of additional HDDs in sites containing forested wetlands with an impact of more than 0.5 acre per crossing or in sites containing any high quality or specially designated forested wetland.	Tennessee has yet to finalize all the HDDs that will be completed during the project, some of which may be used to cross wetland areas. Final decisions on which wetlands will be traversed using HDDs will have to made once all access to the ROW has been obtained, as limited landowner access has hindered Tennessee's ability to assess large wetland areas for HDD installation.	1.3.2.7	1-90

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16	Section 1.3.2.8 (page 1-82) – Evaluate the potential for using HDDs at all major waterbodies (e.g., Schoharie Creek). In addition, evaluate the feasibility of additional HDDs in sites where the following characteristics are present: a. waterbody crossings greater than 30 feet wide where a dry construction method is not feasible; and b. waterbodies listed as sensitive or high quality.	Tennessee has yet to determine the final waterbodies to be crossed using the HDD methods. Limited ROW access has hindered Tennessee's ability to assess each waterbody crossing to allow the appropriate crossing method to be assigned. Tennessee will continue negotiation with Federal and state agencies to determine the appropriate crossing methods for streams greater than 30 feet wide and those containing sensitive species.	1.3.2.8	1-91
17	Section 1.3.2.9.2 (page 1-83) – Indicate whether Tennessee Gas would to the extent possible, position temporary workspace to avoid upland and wetland forest as well as other sensitive resources.	To the extent practicable, Tennessee will site TWS to avoid upland forest, wetland forest, and other sensitive resources. However, Tennessee intends to clear all the workspace within the certificated ROW to allow for safe and efficient pipeline installation.	2.2.10	2-60 to 2-61
18	Section 1.3.3.6 (page 1-85) – Indicate whether Tennessee Gas would install communication towers as part of the Project, and if so describe their location and features.	Tennessee is evaluating the need for communication towers. If needed, the location(s) and features will be provided in the Final ER.	TBP in Final ER	N/A
19	Section 1.3.5 (page 1-86) – Include a discussion regarding whether Tennessee Gas intends to fund a third-party compliance program that would operate at the direction of the Commission staff.	Tennessee will fund a third-party compliance program to operate at the direction of the Commission to ensure the compliance to Project-specific ECPs as well as the requirements of applicable federal, state, and local environmental permits and approvals.	1.3.5	1-95
20	Section 1.4.1 (page 1-87) – Include a detailed description and table listing the nature and frequency of all patrols and inspections that would be used during operation of the pipeline by facility type.	The pipeline and aboveground facilities will be patrolled on a routine basis, and personnel qualified to perform both emergency and routine maintenance on interstate pipeline facilities will handle maintenance.	1.4.4 Table 1.4-3	1-96
21	Section 1.4.2 (page 1-88) – Confirm that Tennessee Gas would not use herbicides to maintain the permanent right-of-way for purposes other than invasive plant species control.	Tennessee will not use herbicides or pesticides on its ROW for purposes of vegetation management unless approved by applicable regulatory agencies or landowners.	1.4.2	1-96 to 1-97
22	Section 1.7 (1-129) – Identify any non-jurisdictional facilities associated with the Project. If there are any non-jurisdictional facilities that would be built as a result of the new gas volumes associated with this Project, include the following detailed information for each facility: a. company/owner; b. type of facility; c. dimensions (pipe diameter, length, horsepower, etc. as appropriate for pipeline and land area for other facilities); d. maps showing locations; e. federal permits required and their status; f. status of local and state permits required; and g. any environmental reviews required for local, state, or federal permitting authorities.	Non-jurisdictional facilities associated with compressor stations and meter stations have been provided in this ER. Additional information, as applicable, will be provided in the Final ER.	1.7	1-128 to 1-131
23	Section 1.8 (page 1-129) – Include landowner specific parcel or tract identification numbers within the referenced Landowner Line List.	Parcel identification numbers have been provided in the landowner line list.	Vol III, App AA	N/A
24	Section 1.8.1 (page 1-131) – Update the section to include the results for wetland and waterbody field surveys conducted or identify when they will be included.	Results from the 2015 field season, including wetland and waterbody field surveys, will be included in the Final ER.	N/A	N/A
24 (part 2)	Section 1.9.3 (page 1-146) – In the forthcoming table listing projects that may contribute to cumulative impacts, also include data columns for watershed identification, air quality control region, and basic information (and/or internet links) regarding impacts where available such as number of waterbodies crossed, acres of wetlands affected, acres of forest affected, and number of crossings of the Appalachian Trail.	Cumulative impacts are addressed in each resource report.	1.9 2.4 3.5 4.6 5.10 6.7 7.6 8.6 9.2	1-141 to 1-149 2-100 to 2-160 3-109 to 3-117 4-68 to 4-70 5-29 to 5-35 6-77 to 6-79 7-18 to 7-20 8-117 to 8-150 9-82
Resource Report 2 - Water Use and Quality				

Comment ID	Comment	Response	Report Section	Page No.
1	General – Include all information listed in Resource Report 2 as pending or "TBD" (or include a schedule for submittal), which includes, but is not necessarily limited to: a. discussion regarding groundwater classification in the New Hampshire portion of the Project, post-consultation with New Hampshire Department of Environmental Services; b. locations of new compressor stations and associated potential impacts to groundwater; c. location of public and private drinking water wells and springs located within 150 feet of any Project workspace area; d. avoidance and mitigation measures that would be taken around wellhead protection areas (WHPAs); e. exact locations of pipeyards and contractors yards, as well as their potential resource impacts; f. impact avoidance, minimization, and mitigation measures for waterbodies containing fisheries resources and how timing restrictions on those waterbodies may impact the Project schedule;	**a.** Tennessee is consulting with NHDES to determine groundwater quality classifications within the Project area. Groundwater classification in the New Hampshire portion of the Project will be provided in the Final ER. **b.** Tennessee will provide updated information relative to sensitive groundwater resources at compressor station locations in the final ER. **c.** Tennessee has compiled information regarding public and private drinking water wells through a combination of consultations with state and local agencies and private landowners. All information gathered to date is included in Table 2.1-2. Table 2.1-2 will also be updated with new information, if received, in the Final ER. **d.** Tennessee has identified all wellhead protection areas (WHPAs) within the Project area. Tennessee is continuing consultation with local governments to determine avoidance and minimization measures around WHPAs. These measures will be provided in the Final ER. **e.** Tennessee has identified locations to be utilized for contractor yards and is in the process of contacting these landowners and obtaining permission to utilize these areas. An analysis of potential water resource impacts will be provided in the Final ER. **f.** Tennessee is consulting with the PFBC, NYSDEC Bureau of Fisheries, MADFW, NHDES, and CTDEEP to determine which waterbodies contain fisheries resources, and those waterbodies whose quality classification and/or standard has been designated to meet the criteria established to support fisheries, but do not provide habitat for fisheries resources. Tennessee will continue to consult with the applicable state agencies to determine appropriate impact avoidance, minimization and mitigation measures for the waterbodies that contain fisheries resources and how timing restrictions on those waterbodies that affect the Project schedule or crossing method. These measures will be provided in the Final ER.	**a.** TBP in Final ER **b.** TBP in Final ER **c.** 2.1.5 **d.** TBP in Final ER **e.** TBP in Final ER **f.** TBP in Final ER	**a.** N/A **b.** N/A **c.** 2-16 to 2-22 **d.** N/A **e.** N/A **f.** N/A
	g. results of database search for contaminated sediments; h. locations of potable water intakes within three miles downstream of any proposed waterbody crossing; i. hydrostatic test water sources, quantity needed, as well as discharge location; k. description and evaluation for any clearing and disturbance related to obtaining water for the HDD or for installation of the HDD guide wires; l. field survey results and wetland delineation reports; m. identification of wetland impacts associated with each facility; n. wetland mitigation provisions; o. State Wetland Classifications; and	g. Tennessee contacted state environmental agencies in Pennsylvania, New York, Massachusetts, New Hampshire, and Connecticut and has searched federal and state databases to determine potential waterbodies with known contaminated sediments crossed by the Project. Contaminated sediments within the Project area are identified by Project component in Section 2.2.5. Additionally, the locations of known state and federal hazardous waste sites in the vicinity of the proposed pipeline and contractor yards are depicted in Figure 2.1-3. **h.** Locations of potable water intakes within 3 miles downstream of any proposed waterbody crossing will be provided in the Final ER. **i.** Tennessee has identified potential sources of hydrostatic pressure test water for the Project, but has not yet determined the discharge locations. Tennessee anticipates filing applications with state agencies for hydrostatic testing water uptake and discharge, subsequent to submittal of the Final ER. Information regarding hydrostatic test water will be provide in the Final ER. **k.** Environmental impacts from withdrawal and discharge of test water will be minimized by utilizing the measures outlined in the Tennessee's Project-specific Plan and Procedures (Volume II, Appendix H) and incorporated into the Project-specific ECPs for each state, as well as by complying with all applicable state and federal permit requirements. **l.** Results from the 2015 field season, including wetland and waterbody field surveys, will be included in the Final ER. **m.** Wetland impacts associated with pipeline construction and operation are described for each state in Section 2.3.1. Tennessee has sited new compressor stations, meter stations, and MLVs outside of sensitive resources to the extent practicable. Discussion relative to wetlands will be submitted in the final ER. Tennessee has also sited access roads and contractor yards outside of wetlands to the extent practicable. **n.** Tennessee will consult with the applicable federal and state regulatory agencies for guidance during development of the proposed mitigation measures and plans, and will incorporate specific recommendations of the agencies. As these permit applications are developed and approved, including required mitigation for impacts to wetlands, these permits, including mitigation provisions, will be provided to the Commission.	**g.** 2.2.5 Attachment 2a **h.** TBP in Final ER **i.** 2.2.7 TBP in Final ER **k.** 2.2.7 **l.** TBP in Final ER **m.** 2.3.1.1 2.3.1.2 2.3.1.3 2.3.1.4 2.3.1.5 TBP in Final ER **n.** 2.3.8	**g.** 2-41 to 2-43 Attachment 2a **h.** N/A **i.** 2-48 to 2-51 **k.** 2-48 **l.** N/A **m.** 2-68 to 2-93 **n.** 2-100

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	p. wetland-specific crossing methods.	**o.** State wetland classifications have been included in the state-specific write-ups for wetlands in Section 2.3.1. **p.** Tennessee will protect and minimize potential adverse impacts on wetlands using construction procedures specified within Tennessee's Plan and Procedures and incorporated into the Project-specific ECPs for each state. The wetland impact tables identify the proposed crossing technique for each wetland.	**o.** 2.3.1.1 2.3.1.2 2.3.1.3 2.3.1.4 2.3.1.5 **p.** 2.3.6 Attachment 2b Table 2.3-1 Table 2.3-3 Table 2.3-5 Table 2.3-7	**o.** 2-68 to 2-93 **p.** 2-96 to 2-98 2b-46 to 2b-66
2	2. General – Include justification for all modifications to the Commission's Procedures including but not necessarily limited to: a. Section 2.2.1.2 (page 2-44) – waterbodies containing sensitive fisheries; b. Section 2.2.2 (page 2-73) – construction of aboveground and pipeline appurtenant facilities; c. Section 2.2.9.1 (page 2-81) – crossing methods for sensitive surface waters; d. Section 2.3.5.1 (page 2-156) – site-specific locations of additional temporary workspace (ATWS) within 50 feet of wetlands; and e. Table 2.3-12 (page 2-161) – any site-specific locations where a construction workspace greater than 75 feet would be utilized in wetlands.	**a.** 1. In accordance with consultations from state agencies, Tennessee will cross streams with discernible flow at the time of construction via fluming or dam and pump, regardless of fisheries or critical habitat designation. This is more restrictive than the Commission's Procedure's requirements (Section V.B.6). b. There are no modifications to the Commission's Procedures with regard to construction of aboveground and pipeline appurtenant facilities. c. Tennessee will utilize dry crossing techniques (Typical Construction Drawing to be included in the final ER) for the majority of the waterbodies crossed by the Project that have flowing water present at the time of crossing. Tennessee is currently evaluating crossing some of the major waterbodies utilizing wet crossing techniques. The pipeline will be buried with a minimum cover of 5 feet over the pipe, unless it is in consolidated rock where the minimum cover depth may decrease. A summary of the waterbodies crossed by the Project can be found in Table 6.0-1 in the Pennsylvania ECP. **d.** Tennessee acknowledges that the Project will require certain ATWS to be located within 50 feet of waterbodies and wetlands. Tennessee has provided site-specific locations of these ATWS and justifications per the Commission's Procedures (Section V.B.2and VI.B.1.a) in Resource Report 8. **e.** Areas of workspace greater than 75 feet wide within wetlands are identified in Resource Report 2. Justification for including workspace greater than 75 feet within wetlands is also provided in the table per Commission's Procedure (Section VI.A.3).	**a.** Vol II, App J through N **b.** Vol II, App J through N **c.** Vol II, App J **d.** Vol II, App J through N **e.** Vol II, App J through N	Volume II
3	Section 2.1 (General) – In the groundwater descriptions, include a detailed description of the aquifers in each state including the names, beginning and ending MPs for each crossing, confining layers, principal use, depth to water, and general water quality. Update Table 2.1-2 to include aquifer, well depth, and yield.	Aquifer information has been included for each state. Tennessee is currently in the process of identifying and compiling information on the location of private drinking water wells and springs within 200 feet of any Project workspace area. As well information becomes available, Table 2.1-2 will be updated and will be submitted in the final ER.	2.1.1.1 2.1.1.2 2.1.1.3 2.1.1.4 2.1.1.5 TBR in Final ER	2-68 to 2-93
4	Section 2.1.1.2.1 (pages 2-4 to 2-6) – Clarify which aquifer system is associated with the sole source aquifer (SSA). Confirm that "Total Mileage" is equivalent to the proposed crossing length of the SSA.	The SSA crossed by the proposed Project is the Clinton Street-Ballpark Aquifer System. "Total Mileage" is the proposed crossing length of the Clinton Street Ballpark SSA.	2.1.1.2.1	2-4 to 2-5
5	Section 2.1.1.2.3 (pages 2-7 to 2-8) – Define the groundwater designation 'Class GA.'	The best usage of Class GA waters is as a source of potable water supply. Class GA waters are fresh groundwater.	2.2.1.2	2-36
6	Section 2.1.1.3.1 (page 2-8) – Include a discussion and complete citations for the U.S. Geological publications Survey publications that characterize the aquifers in the Project area.	Available USGS publications discussed the general characteristics of aquifers expected in the Project area. Although less productive than surficial stratified drift aquifers, bedrock aquifers are more widely used for residential water supplies in areas where public water supplies are not available. Massachusetts has three principal types of bedrock aquifers: crystalline, sedimentary, and carbonate. The crystalline-bedrock aquifer underlies much of Connecticut and is composed mainly of granite, gneiss, and schist. The major sedimentary-bedrock aquifer is located along the Connecticut River valley of west-central Massachusetts and consists of sandstone, shale, and conglomerate, with interbedded lava flows (USGS 1992).	2.1.1.3.1	2-8 to 2-9

Comment ID	Comment	Response	Report Section	Page No.
7	Sections 2.1.1.3, 2.1.1.5, and 2.1.6 (page 2-8, 2-11, and 2-19) – Confirm whether Massachusetts and Connecticut have a Wellhead Protection Program and identify WHPAs accordingly. Discuss construction/operations precautions that would be implemented near WHPAs as well as any mitigation measures that may be required by wellhead protection area managers.	WHPAs in Massachusetts have been identified. Tennessee has requested information on public water supply wells from the CTDEEP and will provide that information in the Final ER. Tennessee will continue consultation with local governments to determine avoidance and minimization measures around WHPAs.	2.1.5.1.3 TBP in Final ER	2-24
8	Section 2.1.1.3.2 (page 2-9) – Confirm whether the Project would impact the drinking water well protected by the Massachusetts Source Water Assessment Program (located in the Town of Erving).	Tennessee has confirmed that the drinking water well located in the Town of Erving will not be impacted by the proposed Project.	2.1.1.3.2	2-9
9	Section 2.1.5 and 2.1.6 (page 2-15 and 2-19) –Include a discussion of all surface water protection areas depicted in Figure 2.1-4 that could be impacted by the Project and mitigation measures for work conducted within surface water protection areas.	Surface Water Protection Areas are listed in Table 2.1-2 and are depicted on Figure 2.1-4 in Attachment 2a.	2.1.5 Attachment 2a	2-17 to 2-21 Attachment 2a
10	Section 2.1.6 (page 2-19) – Confirm whether Tennessee Gas would provide pre- and post-construction testing of water quantity and quality to landowners with wells or springs located within 150 feet of any workspace.	Tennessee has agreed to perform pre- and post-construction monitoring for well yield and water quality for private wells within 200 feet of the proposed construction workspace. Should the integrity of any water supply well be impacted during construction, either water quantity or quality, Tennessee would provide an alternative water source or compensate the landowner for a new, comparable well.	2.1.6	2-27
11	Section 2.1.6 (page 2-19) – Include a discussion of potential aquifer impacts resulting from ground disturbing activities (e.g., HDD drilling, blasting). Include mitigation measures for potentially impacted springs and aquifers.	The Project is not anticipated to have impacts on groundwater quality or supply. Tennessee proposes to implement BMPs designed to avoid, reduce, and/or mitigate potential impacts on groundwater during construction and operation as detailed within the Project-specific ECPs for each state and Tennessee's Plan and Procedures.	2.1.6 Vol II, App J through N Vol II, App H	2-27
12	Section 2.2 – Update section to include results from waterbody field surveys. Discuss typical staging area requirements at waterbody crossings that would be crossed in each state. Identify all waterbodies crossed within karst-prone areas and their crossing methods.	Waterbody field survey data will not be available until Fall 2015. Tennessee will identify all waterbodies crossed within Karst-prone areas and the proposed crossing methods in the Final ER.	TBP in Final ER	N/A
13	Update Tables 2.2-4, 2.2-5, 2.2-6, 2.2-7, and 2.2-8 showing waterbodies crossed by the Project to include the correct crossing width, crossing method, timing restrictions, and any information that is missing or marked as "TBD." Provide clarification on why some waterbodies have "unknown" listed under type of waterbody and clarify what the term "unknown" indicates.	Crossing methods and timing restrictions have been provided. Waterbodies labeled as "unknown" are the result of the waterbody type not being provided by the NHD data source. Ground-truthed survey data will not be provided until Fall 2015; therefore, exact crossing widths are not currently known. Crossing widths will be provided in the Final ER.	Attachment 2b TBP in Final ER	2b-1 to 2b-45
14	Section 2.2.5 (page 2-73) – Identify all areas with known or potentially contaminated sediments.	Tennessee contacted state environmental agencies in Pennsylvania, New York, Massachusetts, New Hampshire, and Connecticut and has searched federal and state databases to determine potential waterbodies with known contaminated sediments crossed by the Project. Tennessee is continuing to review online resources and consult with applicable agencies to obtain information and will provide updated information in the Final ER.	2.2.5 8.3.6 TBP in Final ER	2-41 to 2-43
15	Section 2.2.6 (page 2-76) – Update text based on agency consultations regarding the presence of public/private wells, surface water intakes, and springs in the vicinity of the Project.	Text has been updated with information from agency consultations through May 1, 2015.	2.2.6	2-44 to 2-47
16	Section 2.2.7 (page 2-79) – Include data for hydrostatic test pressure, volume (in gallons) of hydrostatic test water by specific source location (waterbody and milepost [MP]), the expected month water would be withdrawn and discharged, and source alternatives. Identify if any chemicals that may be added to the test water and include proposed treatment and/or disposal method for treated discharge water. Include specific locations of the test water discharges. Include a Hydrostatic Test Plan.	Potential sources of hydrostatic pressure test water have been provided in Table 2.2-9. Additional information regarding hydrostatic pressure testing will be provided in the Final ER.	2.2.7 Table 2.2-9	2-49

Comment ID	Comment	Response	Report Section	Page No.
17	Section 2.2.9 (page 2-88) – Provide updated information on sensitive waterbodies and identify mitigation measures for potential impacts to sensitive waterbodies and fisheries. Section 2.2.10 (page 2-89) – Discuss potential surface water impacts resulting from the operation of the Project (e.g., increased runoff resulting from increased impervious surface).	Updated information on sensitive waterbodies has been provided. Temporary and permanent impacts associated with construction will be minimized to the extent practicable, and Tennessee and its contractors will comply with mitigation measures detailed in Tennessee's Plan and Procedures and required as part of the permits and orders or conditions required for the Project, which will be incorporated into the state-specific ECPs. Tennessee has sited meter stations, MLVs, access roads, and contractor yards outside of sensitive resources to the extent practicable; therefore, impacts on sensitive surface waters are not expected to result from construction, modification, and operation of these facilities. Impacts associated with the pipeline will be limited to the period of construction. A description of impacts associated with compressor station locations will be provided in the Final ER.	2.2.9 Vol II, App H Vol II, App J through N 2.2.10 TBP in Final ER	2-52 to 2-60 2-60 to 2-61
18	Section 2.2.11 (page 2-90) – Include the rationale that a minimum cover depth of 5 feet is adequate for all waterbodies.	The proposed Project facilities will be designed, constructed, operated, and maintained in accordance with the USDOT federal safety standards, Title 49 CFR Part 192. All of the safety features in place meet these standards. Tennessee's minimum specifications for depth of cover would exceed the USDOT requirements for Class 1 locations specified in 49 CFR Part 192, Section 192.327.	11.2.2	11-6 to 11-7
19	Section 2.3 (General) – Update the wetlands section to include results from wetland field surveys. Include the Wetland Delineation Report or an estimate of when Wetland Delineation Report will be included. Clarify how construction impact acreages were calculated. In each table, include specific construction right-of-way widths for each wetland crossed and note any wetlands with irregular workspaces which would create impacts greater than simply calculating length multiplied by width.	Tennessee identified, located, classified, and delineated wetland resources within and adjacent to the Project area through field surveys conducted in 2014. Field surveys will continue throughout the 2015 field season, as survey access permission is granted. For properties without negotiated survey access, the schedule for the completion of field surveys may extend past the issuance of a Certificate of Public Convenience and Necessity should the Project be approved by the FERC.	2.3	2-67 to 2-96
20	Update Tables 2.3-1, 2.3-3, 2.3-5, 2.3-7, and 2.3-9 showing wetlands crossed by the Project to include crossing methods, state wetland classification, crossing length, and any information that is missing or marked as "TBD".	Tables have been updated and are located in Attachment 2b.	Attachment 2b	2b-46 to 2b-66
Resource Report 3 - Fisheries, Wildlife, and Vegetation				

Comment ID	Comment	Response	Report Section	Page No.
1	General – Include all information listed in Resource Report 3 as pending or "TBD" (or include a schedule for submittal), which includes, but is not necessarily limited to: a. copies of additional or continued state and federal agency correspondence with state and federal agencies regarding potential Project-related impacts on existing aquatic, wildlife, vegetation resources (including state- and federally protected species) and associated mitigation measures. The topics addressed in these correspondences should include, but not necessarily be limited to: i. fisheries of special concern; ii. water quality designations; iii. construction timing restrictions; iv. Priority Habitats mapped by Massachusetts Natural Heritage and Endangered Species Program (NHESP); v. the incorporation of Massachusetts BioMap 2 data in agency analyses; vi. mitigation measures to protect interior forest breeding birds and other wildlife; vii. crossing methods that would be used in significant or sensitive wildlife habitats; viii. vegetative communities of special concern; and ix. protected species with the potential to occur within the Project area. b. a discussion and figures of the interior forest blocks that would be crossed by the Project, as mapped by Tennessee Gas; c. results of field surveys conducted to characterize the disposition landscape where the Project would cross the Appalachian Trail as well as a crossing plan for the same location; d. a determination of whether or not the Project would cross the Talcott Mountain State Forest in New Hampshire and associated impacts and mitigation if appropriate; e. a list of vegetative community types that would be crossed by the Project area based on National Land Cover Database mapping for the entire Project area;	**a.** All agency correspondence through May 1, 2015 is provided in Volume II, Appendix B of the ER. **b.** Forest block analysis will be provided in the Final ER. **c.** Field surveys in the vicinity of the Appalachian Trail have not been performed due to lack of access. Results of the surveys will be provided when available in a subsequent filing. **d.** The proposed Project would cross Talcott Mountain State Forest in Connecticut. Impacts associated with the clearing of upland forest will be minimized through compliance with Tennessee's Plan and Procedures and the ECP for Connecticut. **e.** Tennessee has developed detailed landuse-landcover mapping within the Project area using data collected during biological and physical field surveys in 2014, available state-level landuse-landcover GIS data, and interpretation of aerial photography.	**a.** Vol II, App B **b.** TBP in Final ER **c.** TBP in Subsequent Filing **d.** 3.2.2.5.3 Vol II, App H Vol II, App N **e.** Attachment 3a	**a.** Volume II **b.** N/A **c.** N/A **d.** 3-48 **e.** Attachment 3a
	f. a discussion of impacts associated with the temporary or permanent replacement of established, woody, or scrub/shrub vegetation with herbaceous growth, if applicable; g. a discussion of potential construction and operation impacts on vegetation associated with aboveground facilities and appurtenant facilities (MLVs, pig launchers and receivers), temporary and permanent access roads, pipe and contractor yards, cathodic protection systems, and alternating current (AC) mitigation systems; h. copies of consultations with the Natural Resource Conservation Service (NRCS), local soil and water conservation districts, and the U.S. Fish and Wildlife Service (USFWS) regarding right-of-way re-seeding recommendations; i. state-specific Invasive Species Management plans; and j. locations, timing, and results of species-specific surveys conducted for protected species and their habitats within the Project area.	**f.** New areas permanently maintained during operation of the Project facilities will be maintained in an herbaceous/early successional stage of vegetation. Clearing of vegetation will permanently reduce available habitat cover and food sources for certain species of wildlife (i.e., those that primarily rely on forested habitats). However, following a relatively short period of regeneration within the TWS and permanently maintained ROWs, there will be more terrestrial grassland and scrub-shrub habitats that provide important cover and a greater diversity and density of food sources for a different complex of wildlife species. **g.** Discussion of facility impacts is included in the text where data is publicly available and where a facility overlaps with correspondence data already received (e.g., adjacent to the Project centerline). A more thorough description of facility impacts will be included in the Final ER and in subsequent filings as needed. **h.** Tennessee has consulted with the NRCS and the Soil and Water Conservation Districts ("SWCD") and USFWS, for guidance and approval on appropriate erosion control seed mixtures needed to stabilize disturbed areas until indigenous species can be re-established. Tennessee will continue to review all recommendations and develop a plan for stabilization of construction areas with and/or without seed mixtures. **i.** State-specific Invasive Species Management Plans are included in the ECPs. **j.** Species-specific surveys and habitat assessments are underway for various rare plants, bald eagles, bats, and bog turtles, with protocols being developed for many other species and taxonomic groups. Details regarding current and planned surveys are provided in Resource Report 3. The final ER will provide updated survey information and results.	**f.** 3.2.3.1 **g.** 3.2.3.1 **h.** 3.3.4.3 **i.** Vol II, App J-N, Attachment 9 **j.** 3.4.2.1 3.4.2.2 Vol III, App BB	**f.** 3-51 to 3-52 **g.** 3-51 to 3-52 **h.** 3-81 to 3-82 **i.** Volume II **J.** 3-99 to 3-109

Comment ID	Comment	Response	Report Section	Page No.
2	General – Regarding the April 1, 2015 listing of the northern long-eared bat as a threatened species under the Endangered Species Act (ESA), update the following information: a. species current status and implications for the Project; b. revised or additional protection and mitigation measures recommended by state and federal agencies, including requests for surveys. Include updated agency correspondence. c. Table 3.2-1 (3-23) and Table 3.4-1 (page 3-86) – Table 3.2-1 shows northern long-eared bats as being a common wildlife species potentially present in upland and forested wetland habitat types crossed by the Project in Pennsylvania, New York, Massachusetts, New Hampshire, and Connecticut. However, Table 3.4-1 shows New York as the only state in which the species could potentially occur within the Project area. Clarify this apparent discrepancy. d. Section 3.4.2.1.2 (page 3-103) – Section 3.4.2.1.2 states that the USFWS recommends that Tennessee Gas perform biological surveys in the vicinity of the Project alignment to determine potential effects. Confirm whether or not Tennessee Gas plans to conduct these surveys, and provide a timeline for their completion, if applicable.	**a.** The federal listing status of the Northern long-eared bat has been updated through out the Resource Report. **b.** Guidance for avoiding and minimizing impacts to these federal-listed species has come from discussions with both state and federal agencies. Additional impact avoidance and minimization assessments are currently being developed by Tennessee. **c.** Table 3.4-1 has been replaced with a complete table of federal and state listed species based on consultations with federal and state agencies. **d.** During the initial biological surveys in 2014, several small portals were observed and mapped near the Project alignment in Schoharie County, New York. As a result Tennessee's qualified biologist conducted Phase 2 acoustic surveys at these locations during April and May 2015 in an effort to capture the spring emergence from this cave and determine species present. Additional Phase 3 mist-netting surveys are scheduled to confirm species presence.	**a.** 3.4.2.1.2 **b.** 3.4.2.1.2 **c.** 3.4.1.1.1, Table 3.4-1 **d.** 3.4.2.1.2	**a.** 3-100 **b.** 3-100 **c.** 3-84 to 3-85 **d.** 3-100
3	Section 3.0 (page 3-2) – Section 3.0 states that 80% of the pipeline will be co-located with other rights-of-way, while Section 3.2.2.6 states 83% will be co-located with other rights-of-way. Address this discrepancy.	Tennessee has verified that 99 miles of the proposed Project will be co-located with the Constitution Pipeline and 251.5 miles will be co-located with other utilities. Therefore, 84% of the proposed pipeline will be c0-located. This has been updated throughout the ER.	Throughout ER	N/A
4	Section 3.1 and 3.3 (general) – Include copies of the following agency correspondence referenced in the text: a. Pennsylvania Game Commission. September 24, 2014 and January 21, 2015; b. New York Natural Heritage Program, October 3, 2014; c. Pennsylvania Fish and Boat Commission, October 16, 2014; d. Pennsylvania Department of Conservation and Natural Resources, October 16, 2014; e. USFWS, October 17, 2014; f. U.S. Department of Agriculture, January 28, 2015; and g. Massachusetts Association of Conservation Commissions, February 6, 2015.	All agency correspondence referenced in the text has been included. References are listed under the name of the signatory on the letters as follows: a. Taucher, J. 2014, 2015 b. Conrad, N. 2014 c. Smiles, H.A. 2014 d. Bowen, R. 2014 e. Zimmerman, L. 2014 f. Atkinson, K. 2015 g. Benson, E.B. 2015	Vol II, App B	Volume II
5	Table 3.1-3 – Update table with a more recent reference and update the reference section accordingly.	Table 3.1-3 reference and References section has been updated.	3.1.1.3, Table 3.1-3 3.6	3-7 to 308
6	Section 3.1.3 (page 3-15) – include a discussion of the methods that would be used to revegetate waterbody banks and restore them to their pre-construction conditions.	Tennessee will stabilize and restore the stream substrates, banks and riparian zones immediately following completion of construction in accordance with Tennessee's Procedures.	3.1.3 3.1.4 Vol II, App H	3-16 to 3-18
7	Section 3.2.1.3 (page 3-20) – Clarify whether successional palustrine scrub-shrub (PSS) areas are considered wetlands or open land.	Text has been corrected due to an editing error in the previous filing. Scrub-shrub habitats are included in the Open Land category, whereas PSS habitats are included in the Scrub-Shrub Wetlands category.	3.2.1.3 3.2.1.6	3-21 to 3-23
8	Table 3.2-4 – Include data regarding interior forest and edge forest crossed by the Project.	Table 3.2-3, Interior Forest and Edge Forest Crossed by the Project will be completed in the Final ER.	TBP in Final ER	N/A
9	Section 3.2.2.3.3 (page 3-40) – Define "disposition landscape".	A synonym for "disposition" is "nature" or "character". Changed "disposition" to "natural" in text	3.2.2.3.3	3-32
10	Section 3.3.2.3.2 (page 3-76) – Include a source for the statement that "the Massachusetts Audubon Society identifies the most serious threat to this ecosystem as natural ecological succession, and that regular mowing and/or burning of vegetation is necessary to maintain existing grassland and pitch pine communities."	Updated with citation: Massachusetts Audubon Society. 2015b. Site Summary: Montague Sandplains. [Online WWW]. Available URL: http://www.massaudubon.org/our-conservation-work/wildlife-research-conservation/statewide-bird-monitoring/massachusetts-important-bird-areas-iba/important-bird-area-sites/(id)/38. [Accessed January 2015].	3.3.2.3.2 3.6	3-72

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11	Section 3.3.2.3.2 (page 3-76) – Confirm whether Tennessee Gas is coordinating with appropriate state agencies regarding vegetation communities of special concern located throughout the Project area.	During consultations with state heritage programs, Tennessee requested information on all state-listed species including rare, threatened, and endangered species, as well as any other ecological resources or species of special concern within the study corridor. Tennessee has received information on natural communities from New York, Pennsylvania, and New Hampshire. In Connecticut, significant natural communities are tracked in the Connecticut Natural Diversity Database; however, none were identified during our most recent consultations. The Massachusetts Natural Heritage and Endangered Species Program also tracks distribution and status of Priority Natural Communities and exemplary occurrences of more common community types across the state. No Priority Natural Communities were identified in most our recent consultation; however, there is a natural community GIS data layer available from MassGIS which was used to identify vegetation communities of special concern in Massachusetts.	3.3.2.2 3.3.2.3.1 3.3.2.3.2 3.3.2.3.3 3.3.2.3.4 3.3.2.4 3.3.2.4.1 3.3.2.4.2 3.3.2.4.3 3.3.2.5 3.3.2.5.1	3-70 to 3-78
12	Section 3.3.2.3.3 (page 3-76) – Confirm whether or not the Project (including temporary construction workspace) would cross any Terrestrial Hemlock Ravine natural community.	Text has been revised to state: "There is also a terrestrial hemlock ravine natural community mapped at this site but this is a relatively common community (State Rank S4) and most of it is located greater than 200 feet from the Project centerline and no impacts to this community are expected."	3.3.2.3.3	3-73
13	Section 3.3.2.5 (page 3-78) – Clarify whether the floodplain forest habitat along the Farmington River along Segment S would be impacted by the HDD crossing at this location. Confirm that the text and Table 2.2-8 agree on the location, crossing methods and potential impacts.	Impacts to the overlying floodplain forest habitat associated with tree removal for the HDD at the Farmington River have not yet been determined. The extent of these impacts will be provided in the final ER.	TBP in Final ER	N/A
14	Section 3.3.4.1 (page 3-80) – Include a description of the circumstances in which a tree located within an area slated for vegetation clearing would not be felled.	Tennessee has sited workspace away from sensitive resources to the extent practicable. During construction, Tennessee plans to clear all approved workspace areas. Any trees that are to be saved will be sufficiently marked (i.e., flagging and construction fencing) before ROW clearing begins.	3.3.4.1	3-79 to 3-80
15	Discuss how Tennessee Gas intends to address the bat hibernacula present near the Wright Compressor Station.	The Wright Compressor Station site will be located to avoid direct affects to the hibernacula. Additional impact avoidance and minimization assessments are currently being developed by Tennessee.	3.4.2.1.2	3-100 to 3-101
Resource Report 4 - Cultural Resources All material filed with the Commission containing **location, character, and ownership** information about cultural resources must have the cover and any relevant pages therein clearly labeled in bold lettering: **"CONTAINS PRIVILEGED INFORMATION--DO NOT RELEASE."**				
1	Include all information in first draft Resource Report 4 labeled as "TBD" or pending, not necessarily limited to: a. Table 4.4-4 (Parcel), Table 4.4-6 (Parcel), Table 4.4.18 (Parcel), Table 4.4-20 (Parcel), and Table 4.4-21 (Parcel); and b. Data missing from the first draft Resource Report 4, such as tables for the Susquehanna County PA Supply Path Head Station, Delaware County NY Supply Path Mid Station, Schoharie County NY Supply Path Tail Station, Schoharie County NY Market Path Tail Station, Rensselar County NY Market Path Mid Station, Maritimes Delivery Line in Middlesex County MA, Concord Delivery Line in Middlesex County MA, Fichburg Lateral Extension in MA, North Worcester Lateral in MA, Market Path Station 2 in Berkshire County MA, Market Path Mid Station 3 in Franklin County MA, Market Path Tail Station in Middlesex County MA, Wright to Dracut Pipeline Segment in NH, portion of Haverhill Lateral in NH, portion of Fitchburg Lateral in NH, Market Path Mid Station 4 in Hillsborough County NH, the 300 Line Loop in CT, and the Samford Loop in CT.	**a.** Parcel information for archaeological resources has been removed throughout the report to create a non-confidential public version of the report. The Overview Report in Volume III, Appendix CC contains the parcel information. **b.** There are no known sites present on or adjacent to the proposed locations for the Supply Path Head Station, Supply Path Mid Station, Market Path Mid Station 1, Market Path Mid Station 3, Market Path Tail Section, Market Patch Mid Station 4, Maritimes Delivery Line, Concord Delivery Line, and the Fitchburg Lateral Extension. Previously recorded archaeological sites for the Supply Path Tail Station, Market Path Head Station, Market Path Mid Station 2, have been provided. The North Worcester Lateral and the Stamford Loop are no longer part of the Project. Field surveys are underway or scheduled to determine if archaeological sites are present. This information will be updated in the Final ER.	**a.** 4.4.1 Vol III, App CC **b.** 4.4.1	**a.** 4-8 to 4-26 Volume III **b.** 4-8 to 4-26
2	Include all new and previously unfiled correspondence, meeting notes, phone logs, or emails between Tennessee Gas and the State Historic Preservation Offices (SHPOs). This should include copies of comments from the Massachusetts SHPO dated October 1, 2014 and January 26 and April 22, 2015,	All agency correspondence through May 1, 2015 is provided in Volume III, Appendix DD of the ER.	Vol III, App DD	Volume III

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3	Include all new or previously unfiled correspondence, meeting notes, phone logs, or emails between Tennessee Gas and interested Indian tribes. This should include copies of notes from the March 18 and April 27, 2015 meetings with Indian tribes. Update Table 4.2-1 accordingly.	All correspondence with Native American Tribes through May 1, 2015 is provided in Volume III, Appendix EE of the ER. Table 4.2-1 has been updated and relocated to the Appendix.	Vol III, App EE	Volume III
4	Attachment 4a – Pages 239 through 418 appear to be duplicates of pages 59 through 238. Update the attachment to remove any duplicated correspondence from SHPOs and tribes.	Duplicate pages have been removed.	Attachment 4a	N/A
5	Include copies of first draft work plans-research designs produced for each state. Document that the research designs-survey protocols were submitted to the SHPO for each state, and interested Indian tribes, and file the comments of the SHPOs and tribes on the work plans. File revised work plans for each state that address the comments of the SHPOs and tribes.	Workplans have been included in the Privileged and Confidential volume of this filing. Updated/revised workplans will be included in the Final ER.	Vol III, App DD	Volume III
6	Include copies of the draft Unanticipated Discovery Plan for each state. Document that the Discovery Plans were submitted to the SHPOs and interested tribes. File comments from the SHPOs and tribes on the Discovery Plans. File revised plans that address the comments of the SHPOs and tribes.	The current draft UDP addresses tribal comments received on or before May 28, 2015, and the document will undergo further revisions in collaboration with involved tribes, agencies, and stakeholders. This first revision to the draft UDP is presented as an attachment to Resource Report 4. Agency correspondence has also been included in the Privileged and Confidential volume of this filing.	Attachment 4a Vol III, App DD	4a-1 to 4a-28 Volume III
7	Explain how Native American monitors or survey crew members would be incorporated into the on-the-ground cultural resources inventories conducted through Tennessee's consultant, Louis Berger. Include copies of the results of investigations by Indian tribes to identify traditional cultural properties, ceremonial stone landscapes, burials, sacred sites, or other properties of cultural or religious importance to tribes that historically used or occupied the Project area.	It is assumed that as many as 12 tribes may require field access to view specific resource areas, participate in field meetings, survey for resources of specific interest to tribes, or monitor cultural resource surveys in the Project area. Project-specific safety training is required for Project ROW access. When fieldwork commences, Tennessee's cultural resource consultant will accompany interested tribes into the Project area. Arrangements with particular tribes will be coordinated in advance for specific areas, or tribes will have the option to meet archaeological field crews at scheduled times and accompany them onto permissioned land parcels in the Project area. At the time of this Resource Report, no in-field tribal studies have been conducted.	4.2.2	4-4 to 4-7
8	At a minimum, Resource Report 4 should include an Overview Report that complies with Section V of the staff's "Guidelines for Reporting on Cultural Resources Investigations for Pipeline Projects," and includes the results of a literature review and site file search. Revise all the tables listing previously recorded archaeological sites and aboveground historic sites to cover all sites within 0.5 mile of the proposed facilities, including Smithsonian site number, site name if known, site type, segment, parcel, milepost or location, distance in feet from centerline, recorder and date, evaluation, and SHPO opinion of National Register of Historic Places (NRHP) eligibility and the date of that determination.	The Overview Report has been included in the Privileged and Confidential volume of this filing. The Overview Report will continue to be revised and an updated version will be provided with the Final ER.	Vol III, App CC	Volume III
9	Include a schedule for the conduct of cultural resources surveys, and the filing of the results of those investigations. Also, include a table that lists all Project segments covered by a cultural resources survey, the date of the survey, and the archaeological or historic standing structures recorded within each inventoried segment, by state. The data in the table of newly identified sites should include Smithsonian site number, site name if known, site type, segment, parcel, milepost or location, distance in feet from centerline, company/recorder and date of recordation, NRHP evaluation, and recommendation for future work. File copies of all cultural resources survey reports and the comments of the SHPOs and Indian tribes on those reports.	Cultural resource field surveys began in September 2014 and continued through December 2014, at which time winter weather conditions (snow cover and frozen soil) inhibited further archaeological field studies. Field studies were confined to areas of Pennsylvania and New York where the SHPOs had approved the predictive model and work plan and the number of parcel permissions received were greater than 60 percent of the total landowners along the line. In 2014, 30.23 miles of survey were completed in Pennsylvania and 21.77 miles in New York. In addition, 11.47 miles of survey of alternate routes were completed as part of the previously proposed route. Field surveys resumed in early spring of 2015 in areas with approved access. Survey reports will be submitted to the SHPOs upon completion of the surveys.	4.4	4-8 to 4-66
10	Include a response to the February 9, 2015 letter from the town of Milford, New Hampshire, indicating how historic resources would be identified along the pipeline route through the town, and addressing how the town would be included as a "consulting party" in the Section 106 compliance process.	The resource identification survey is under development with the NHDHR. Once this is complete, a response will be provided to the Town of Milford. All correspondence will be provided in a subsequent filing.	TBP	N/A

Comment ID	Comment	Response	Report Section	Page No.
11	At a site visit of the planning crossing of the Hudson River, FERC staff identified a small graveyard approximately 400 feet from the west bank of the river. Currently the pipeline centerline would be very near the site. Provide an avoidance plan for this site.	This cemetery and its relationship to the project area is not yet confirmed. Avoidance plans for this and other sites will be included in a subsequent filing, as necessary.	N/A	N/A
12	Document that Tennessee Gas has submitted a revised research design for Massachusetts in response to comments from the SHPO on the first draft.	A permit application for archaeological studies of the revised Project alignment was submitted to MHC on April 4, 2015. Comments on the permit application were issued by MHC in a letter dated April 22, 2015. Copies of this correspondence can be found in Volume III, Appendix DD. The revised permit application was submitted June 12, 2015, incorporating the suggested changes and in response to the comments.	4.2.1.3	4-3 to 4-4
Resource Report 5 - Socioeconomics				
1	General – Include all information listed in Resource Report 5 as pending or "TBD" (or include a schedule for submittal), which includes, but is not necessarily limited to: Section 5.8 (page 5-12) – Environmental Justice discussion for aboveground facilities. Include a table that includes a breakdown of minority and low-income populations near each facility.	Additional EJ information will be provided at the municipal level and will include aboveground facilities in the final ER.	TBP in Final ER	N/A
2	Section 5.1.3 (page 5-3) – Include an estimated percentage of the non-local workers that would be relocating to the Project area with their families. Include an estimate of the total population increase to the Project area.	The Project construction workforce is anticipated to temporarily increase the population by approximately 3,004 people. Tennessee does not anticipate families of non-local staff temporarily locating to the project area.	5.1.3	5-3 to 5-4
3	Section 5.1.3 (page 5-3) – Include an estimate of the average construction workforce and peak construction workforce by year for pipeline facilities and for above ground facilities.	Construction of the pipeline and aboveground facilities is expected to occur between 2017 and 2019. It is anticipated that for 2017, the average construction workforce for pipeline and aboveground facilities will be 2,291 with peak construction workforce of 5,247 in the summer months. For 2018, the average construction workforce will be approximately 2,350 with a peak in summer months of 5,247. For 2019, the average construction workforce will be 292 with a peak in summer months of 761. Approximately 50% of the construction workforce will come from the local population.	5.1.3	5-3 to 5-4
4	Table 5.2-1 (page 5-5) – In footnote number 2, clarify how Rental Vacancy Rate is determined including the units.	Footnote #2 of Table 5.2-1 has been revised to include the U.S. Census Bureau's definition for Rental Vacancy Rate.	5.2	5-6
5	Section 5.3 (page 5-7) – For each county in the Project area, include the following: a. number of police departments; b. number of fire departments; c. number of school districts and total enrollment; and d. number of hospitals and total number of hospital beds.	Numbers of public service resources, including police and fire departments, school districts with total enrollment, and hospitals and number of hospital beds by county for the project area are listed in Table 5.3-1.	Attachment 5a	5a-1 to 5a-8
6	Section 5.4 (page 5-9) – Specify the typical and maximum duration of a complete road closure when no detour is available, and include mitigation measures to ensure emergency access during these periods.	Tennessee avoids complete road closures without an appropriate detour whenever possible. In the event that a road must be closed with no detour, Tennessee will consult with local agencies and officials to secure necessary approvals.	5.4	5-11
7	Section 5.4 (page 5-10) – Discuss the likelihood or provide an affirmative statement of whether "contractors may utilize buses" for worker transportation (emphasis added). Include locations of any "Park-N-Ride areas" and discuss traffic management and mitigation measures at these areas.	Workers will park at the contractor yards and will be bussed to their work locations.	5.4	5-11
8	Section 5.8 (page 5-12) – Include an environmental justice analysis (please refer to guidance and comments by the EPA) and discussion for the pipeline portion of the Project. Include a table that includes a breakdown of minority and low-income populations for each state and county crossed by the Project.	An Environmental Justice analysis has been provided at the county level, including a table of race/ethnicity and income.	5.8.1 Table 5.8-1	5-18 to 5-22
Resource Report 6 - Geological Resources				

Comment ID	Comment	Response	Report Section	Page No.
1	General – Include all information listed in Resource Report 6 as pending or "TBD" (or include a schedule for submittal), which includes, but is not necessarily limited to: a. mines reported along the proposed pipeline routes based on state databases; b. oil and gas well locations; c. areas of severe erosion; d. faults crossed by Project pipeline facilities; e. steep slopes (15 to 30 percent) crossed by Project; f. blasting locations by MP; and g. Paleontological Resources Plan.	**a.** State data for mines has been used for Pennsylvania and New York. USGS Data has been used for Massachusetts, New Hampshire, and Connecticut. State data for mines in these states will be provided in the Final ER. **b.** A complete table and discussion of oil and gas wells located within 0.25 mile of the pipelines, workspace, ATWS, aboveground facilities, and access roads will be provided in the Final ER. **c.** Areas of severe erosion potential have been provided in Tables 6.4-1 and 6.4-2. **d.** Faults crossed by the pipeline facilities have been provided in Table 6.4-3 in Attachment 6b of Resource Report 6. **e.** Steep slopes (15 to 30 percent) crossed by the project are included in Table 6.4-7. **f.** Tennessee cannot provided exact mileposts for blasting activity until the construction phase of the project, as exact rock depth and type can only be confirmed once excavation begins. Areas of low, moderate and high probability of blasting activity will be determined and refined as Tennessee completes periodic field geotechnical surveys along the pipeline route. **g.** Based on the estimated depth of disturbance, the proposed pipeline construction activity is not anticipated to disturb paleontological resources. However, Tennessee will include their "Procedures Guiding the Discovery of Unanticipated Cultural and Paleontological Resources and Human Remains Plan" in the Final ER.	**a.** 6.3.1 6.3.2 **b.** TBP in Final ER **c.** 6.4.1.1.1 6.4.1.1.2 **d.** Attachment 6b, Table 6.4-3 **e.** Attachment 6b, Table 6.4-7 **f.** 6.2.3 **g.** TBP in Final ER	**a.** 6-37 to 6-38 **b.** N/A **c.** 6b-86 to 6b-94, 6-49 **d.** 6b-95 to 6b-101 **e.** 6b-109 to 6b-124 **f.** 6-36 **g.** N/A
2	General – Clarify whether Tennessee Gas will be conducting geotechnical field surveys. Include the following information regarding field surveys for assessing potential hazards from karst, karst features within the right-of-way (ROW), steep slopes, and landslides: a. what areas would be surveyed; b. a schedule for both when surveys would be conducted and when results would be made available; c. who would conduct the surveys, e.g., a geotechnical engineer or certified geologist; and d. if site specific recommendations for construction techniques would be developed for areas identified as having a hazard.	Tennessee will perform, at a minimum, field geotechnical surveys at all HDD and direct pipe trenchless crossing areas, as well as large or complex road bore locations. These geotechnical surveys will be performed under the oversight of a geotechnical engineer. Tennessee will not necessarily perform field geotechnical investigations around karst, steep slope or landslide prone areas, but all these features are taken into consideration and avoided as much as possible during the planning phase of the Project. Site specific construction techniques will be developed based on the results of geotechnical investigations.	6.4.4.7	6-61

Comment ID	Comment	Response	Report Section	Page No.
3	Section 6.2 (pages 6-67 to 6-73) – Include the following information is incorporated into the blasting plan, Resource Report 6, and other Resource Reports as appropriate: a. Federal and state regulations that would be adhered to if blasting would be needed; b. monitoring of blasting including peak particle velocity; c. the monitoring of wells and springs within proximity to blasting activities including the type of monitoring, when monitoring would take place, and any specific testing that would take place;	Tennessee has developed a Project-specific Blasting Management Plan that establishes procedures and safety measures that Tennessee's Contractor will adhere to while implementing blasting activities along the pipeline ROW (Volume II, Appendices J, K, L, M, and N, Attachment 8). In addition, the construction Contractor will be required to submit a detailed Blasting Specification Plan to Tennessee that is consistent with the provisions of the Blasting Management Plan and Kinder Morgan Construction Specifications. The Contractor's plan, when approved by Tennessee, will be incorporated into the Contractor's scope of work. **a.** Tennessee will obtain all the necessary federal, state, and local blasting permits prior to construction. Blasting standards will be designed to meet or exceed all applicable federal, state, and local requirements covering the use of blasting materials. **b.** Monitoring of blasting will occur if blasting is deemed necessary. Seismograph equipment will be used to measure the peak particle velocity ("PPV") of all blasts in vertical, horizontal, and longitudinal directions. Seismic monitoring will be discontinued only if the blasting schedule and blasting performance consistently produce PPVs at the blast site that are lower than the maximum allowable limit; and Tennessee's representative authorizes discontinuation. The PPV will be measured at any blasting location within 200 feet of water wells and potable springs. A Blasting Log Record will be completed immediately after each blast . **c.** An independent Contractor will inspect structures and wells prior to blasting within 200 feet of the construction work area, locations requested by the pipeline Contractor, and at the request of an affected landowner. Post-blast inspections will be performed as warranted. Blasting will be performed by registered blasters and monitored by blasting inspectors. During blasting, the Contractor will monitor ground vibrations at the nearest structure (or well) within 200 feet of the construction work area.	Vol II, App J through N, Attachment 8 **a.** 6.2 **b.** 6.2 **c.** 6.2 2.1.6	Volume II **a.** 6-31 to 6-34 **b.** 6-31 to 6-34 **c.** 6-31 to 6-34 2-27
	d. damage mitigation measures including under what conditions the measures would be used (e.g., blasting mats); and e. how Tennessee Gas would handle damage potentially caused by blasting and damage claims.	**d.** Before blasting, a site-specific Blasting Specification Plan must be submitted by the Contractor to Tennessee for approval. Tennessee will contract a third-party engineer with expertise in blasting operations to review the site-specific blasting plan. The engineer will analyze the data to determine the combined stress level of each affected pipeline and will make recommendations and/or forward approval to Tennessee before blasting may commence. Special blasting controls will be required where dry waterbody crossings are specified. The type of blasting material, size of charges, sequence of firing, etc. will be selected to minimize shock wave stresses on aquatic life adjacent to the blasting area. In addition to the use of matting to control fly rock, where specified, the Contractor will furnish the necessary labor and equipment to employ air bubble curtains. **e.** In the unlikely event that blasting activities temporarily impair well water within 200 feet of the construction work area, Tennessee will provide alternative sources of water or otherwise compensate the owner. If well damage is substantiated, Tennessee will either compensate the owner for damages or arrange for a new well to be drilled. In the unlikely event that structural damage occurs at a nearby structure as a result of construction activities, the owner will be compensated for damages or appropriate repairs will be made.	**d.** Vol II, App J through N, Attachment 8 **e.** 6.2	**d.** Volume II **e.** 6-31 to 6-34

Comment ID	Comment	Response	Report Section	Page No.
4	Section 6.3 (pages 6-73 to 6-82) – If any mines surface and/or underground are located proximal to, or would be crossed by, the Project. Include a detailed discussion of measures that would be taken to minimize hazards to the pipeline from mining operations. Include a discussion of: a. how hazards occurring due to blasting would be minimized; b. measures that would be used to prevent potential damage from excavation; c. discussion of unstable surfaces, landslides, and slumping in mining areas; and d. measures to prevent contamination from mine tailings.	Tennessee will implement mitigation measures and BMPs described in Project-specific ECPs for each state. The active Bluestone mining operation, located approximately 1,240 feet from the pipeline facilities in New York, and its associated extraction methods (e.g., drilling and blasting) will be further reviewed for potential pipeline disturbance and avoidance. **a.** Tennessee routes its pipelines to avoid mining areas where blasting can occur. In the event that mining activity encroaches on an existing pipeline, Tennessee would evaluate the hazards and risks on a case by case basis, and if needed, related the pipeline. During construction, Tennessee will implement Tennessee's Project-specific Plan and Procedures. The Plan and Procedures, along with any required additional conservation measures, will be provided in Tennessee's Project-specific ECPs for each state. Through implementation of the BMPs set forth in the Plan and Procedures, and ECPs, it is not anticipated that the Project will have an adverse impact on mineral resources. **b.** During construction, Tennessee will implement Tennessee's Project-specific Plan and Procedures. The Plan and Procedures, along with any required additional conservation measures, will be provided in Tennessee's Project-specific ECPs for each state. Through implementation of the BMPs set forth in the Plan and Procedures, and ECPs, it is not anticipated that the Project will have an adverse impact on mineral resources. **c.** Tennessee does not allow excavation or mining activity on its easement, unless approved in advance by Tennessee. Tennessee would provide a trained excavation observer to monitor excavation and ensure pipeline integrity is maintained. Tennessee works to inform all landowners about applicable One Call rules, regulations and benefits. During the routing phase of any pipeline projects, Tennessee would avoid areas known to be unstable or landslide-prone as much as possible. **d.** Tennessee cannot oversee the handling of a mining company's excavations or spoil. Tennessee would not normally allow min tailings to be placed on top of a pipeline.	6.3.7 **a.** 6.3.7 Vol II, App H Voll II, App J through N **b.** Vol II, App H Voll II, App J through N **c.** 6.3.7 **d.** 6.3.7	6-47 **a.** 6-47 **b.** Volume II **c.** 6-47 **d.** 6-47
5	Section 6.3 (page 6-73 to 6-82) – Include a table and discussion of oil and gas wells located within 0.25 mile of the pipelines, ATWS, aboveground facilities, and access roads by MP. Include the following information: a. the total number of active, inactive (plugged), and proposed wells that would be within 0.25 mile of the Project; b. identify any natural gas storage facilities that would be located with 0.25 mile of the Project; c. measures that would protect any well that may be located within the working area and/or located proximal to the working area; and d. measures that would be taken if an unknown and unmapped well is encountered during construction.	A complete table and discussion of oil and gas wells located within 0.25 mile of the pipelines, workspace, ATWS, aboveground facilities, and access roads will be provided in the Final ER. **a.** There are no active or inactive oil and gas wells located or proposed within 0.25 mile of the proposed Project in Massachusetts, Connecticut, or New Hampshire. Oil and gas well data for New York and Pennsylvania will be provided in the Final ER. **b.** No natural gas storage facilities have been located with 0.25 mile of the Project. **c.** it is not anticipated that work will be proposed within close proximity to any oil and/or gas wells. However, protective measures will be provided in the Final ER. **d.** The probability of encountering an unknown or unmapped oil and/or gas well during construction is very low and Tennessee does not anticipate this occurring due to the ongoing land owner notification process and due diligence. However, measures that would be taken in the event of an encounter with an unknown and unmapped well will be provided in the Final ER.	TBP in Final ER **a.** TBP in Final ER **b.** 6.6 **c.** TBD in Final ER **d.** TBD in Final ER	N/A **a.** N/A **b.** 6-76 **c.** N/A **d.** N/A
6	Section 6.4.1.2 (pages 6-92 to 6-96) – Include US Geological Survey (USGS) probability estimates for both 2 percent and 10 percent exceedance for all states. Include a figure that displays the Project and the seismic probability zones for both 2 percent and 10 percent exceedances in 50 years.	Section 6.4.1.2 has been revised to include the USGS probability estimates for both 2 percent and 10 percent exceedance with regard to seismic risk. The estimated peak horizontal ground acceleration ranges from approximately two to five percent having a 10 percent probability of exceedance in 50 years (USGS 2014c). The estimated peak horizontal ground acceleration ranges from approximately four to 30 percent having a two percent probability of exceedance in 50 years. Figure 6.4-1 illustrates the seismic probability zones in relation to the Project location.	6.4.2 Attachment 6a	6-49 to 6-50 Attachment 6a
7	Section 6.4.1.2.1 (page 6-93) – Include a citation for the second bulleted statement in this section.	The following citation has been added: (GeoEngineers 2014) GeoEngineers, Inc. 2014. Desktop Geology and Geohazard Risk Evaluation Report, May 29, 2013, updated 2014.	6.4.2.1	6-50
8	Section 6.4.1.2.1 (page 6-93) – Define "small to moderate." in the third bulleted statement in this section.	A small to moderate magnitude earthquake is considered to be lower than 4 on the Richter scale.	6.4.2.1	6-50

Comment ID	Comment	Response	Report Section	Page No.
9	Table 6.4-3 – Include the type of fault, a class category for the listed faults, identify if the faults are class A, B, C, or D within the USGS fault data base, and include the age of the most recent movement or displacement for each.	Table 6.4-3 will be updated with additional seismic fault information in the Final ER.	TBD in Final ER	N/A
10	Section 6.4.1.3.3 (page 6-96) – Table 6.4-3 identifies numerous faults crossed by the Project in Massachusetts; however, the text in Section 6.4.1.3.3 states that the Project would potentially cross three fault lines in Massachusetts. Clarify this discrepancy.	The text has been revised to state the following: "Numerous faults are mapped in Massachusetts . . . "	6.4.3.3	6-54
11	Section 6.4.1.4.7 (page 6-112) – As part of mitigation measures for Project areas located in areas of potential karst terrain prepare a karst mitigation plan that identifies who would be responsible for identifying karst features during construction, who would be notified of the karst features discovery, general karst remediation measures that could be used, and if a geotechnical expert, such as a certified geologist, would be employed to evaluate the karst feature and include site specific remediation recommendations.	Tennessee has prepared Karst Mitigation Plans for New York and Massachusetts that provide guidelines for assessment and remediation of karst features that may be encountered during construction. These Plans are included in the New York ECP and the Massachusetts ECP, respectively.	6.4.4.7 Vol II, App K, Attachment K13 Vol II, App L, Attachment L13	6-60 to 6-61 Volume II
12	Section 6.4.1.4.7 (page 6-114) - Prepare and include a mitigation plan for post-construction karst development within the ROW	To minimize the potential for post-construction sinkhole development, Tennessee will adhere to Tennessee's Plan and Procedures. Additionally, Tennessee has prepared Karst Mitigation Plans for New York and Massachusetts that include mitigation measures for post-construction karst (i.e., sinkhole) development within the ROW. These Plans are included in the New York ECP and the Massachusetts ECP, respectively.	6.4.4.7 Vol II, App K, Attachment K13 Vol II, App L, Attachment L13	6-60 to 6-61 Volume II
13	Section 6.4.1.5 (page 6-115) - Provide a table of landslide susceptibility/incidence showing the MP intervals of areas crossed by the pipeline that are prone to landsliding where construction would take place along the toes of slopes and/or on side-slopes.	Tables 6.4-5 and 6.4-6 contain landslide susceptibility/incidence by MP in the vicinity of the pipeline and compressor stations/meter stations, respectively.	6.4.5	6-62 to 6-69
Resource Report 7 - Soils				
1	General – Include all information listed in Resource Report 7 as pending or "TBD" (or include a schedule for submittal), which includes, but is not necessarily limited to: a. acreage of prime farmland soils that would be affected by construction and operation associated with compressor stations and MLVs; b. state-Specific ECPs; and c. proposed mitigation to minimize impact on soils.	**a.** Acreages of prime farmland soils that would be affected by construction and operation of the compressor stations and MLVs are included in Table 7.2-1 in Attachment 7b. **b.** Draft ECPs for each state have been prepared and submitted with this filing. **c.** Proposed mitigation to minimize impacts to soils is provided in Section 7.5. Additionally, soil impacts will be mitigated through implementation of Tennessee's Plan and Procedures.	**a.** 7.2.1 **b.** Vol II, App J through N **c.** 7.5 Vol II, App H	**a.** 7b-283 to 7b-285 **b.** Volume II **c.** 7-10 to 7-17 Volume II
2	General – Include justification for any modifications to the Commission's Plan.	Proposed Project-specific modifications to the Commission's Plan and Procedures are detailed in Section 1.3.2.9. Tennessee's Plan and Procedures are included in Volume II, Appendix H.	1.3.2.9	1-91 to 1-92
3	General – Include a table and discussion of vulnerable soils crossed by the Project based on NRCS guidelines.	A summary of soil characteristics is provided in Table 7.1-1 in Attachment 7b.	7.1.1	7b-1 to 7b-238
4	General – Include summary tables that identify soil limitations that would be impacted by construction of the Project for pipeline facilities, aboveground facilities (including compressor stations, meter stations, and MLVs), temporary access roads, permanent access roads, and contractor yards by segment, MPs, state and county in acres. Include a table for both permanent impacts and temporary impacts. An example of a summary table is provided below.	Table 7.3-1 includes a summary of soil limitations for the Project.	Attachment 7b	7b-287 to 7b-322

Comment ID	Comment	Response	Report Section	Page No.
5	General – Include a Section addressing invasive plant species and soil pests. The Section should address development of procedures, in coordination with the appropriate state and local agencies, to prevent the introduction or spread of invasive species, noxious weeds, and soil pests resulting from construction and restoration activities.	Invasive plant species and soil pests are discussed in Section 7.5.7, Environmental and Agricultural Inspection, and Section 7.5.6, Revegetation. Additionally, Tennessee has prepared state-specific Environmental Construction Plans, which include an Invasive Species Management Plan for each state.	7.5.7 7.5.6 Vol II, App J, Attachment J9 Vol II, App K, Attachment K9 Vol II, App L, Attachment L9 Vol II, App M, Attachment M9 Vol II, App N, Attachment N9	7-16 to 7-17 Volume II
6	General – Include the mitigation measures that Tennessee Gas would incorporate into its state-specific ECPs to mitigate impact to soils including erosion prone soils, stony/rocky soils and shallow depth to bedrock, soil compaction, low revegetation potential, poor drainage, hydric soils, and prime farmlands.	Temporary soil impacts will be limited to the pipeline ROW during the period of construction and mitigated through implementation of Tennessee's Plan and Procedures and Tennessee's state-specific ECPs. The ECPs include procedures for soil conservation measures which will be implemented during construction and operation of the proposed Project. Detailed plans include but are not limited to: BMPs, Soil Protection and Subsoil Decompaction Mitigation Plan, Organic Farm Protection Plan, and Winter Construction Plan.	Vol II, App H Vol II, App J through N	Volume II
7	General – Include a discussion on ground heaving and any potential hazards it might pose to the Project.	A discussion on ground heaving has been included.	7.4.6 7.5 7.5.1 7.5.3	7-10 7-10 7-10 7-13
8	General – Include a discussion of stony / rocky soils and include this soil limitation in Tables 7.1-1 through 7.1-3, 7.2-1, and 7.3-1.	This information will be included in the Final ER.	TBD in Final ER	N/A
9	Section 7.3 (page 7-5) – Include a table describing the extent of prime farmlands including the Project facility, state, county, and MPs.	Acreages of prime farmlands, rare or unique soils of statewide importance crossed by the Project and aboveground facilities affected during construction and affected during operation are listed by state, county soil unit name, segment and MP in Tables 7.1-1 for the Project, listed in Table 7.1-2 for access roads, listed in Table 7.1-3 for contractor yards and listed in Table 7.2-1 for appurtenant facilities.	Attachment 7b	7b-1 to 7b-285
10	Section 7.3 (page 7-5) – Include a summary table of impacts to prime farmlands and farmlands of state wide importance by type. See the preferred format below.	Acreages of prime farmlands, rare or unique soils of statewide importance crossed by the Project and aboveground facilities affected during construction and affected during operation are listed by state, county soil unit name, segment and MP in Tables 7.1-1 for the Project, listed in Table 7.1-2 for access roads, listed in Table 7.1-3 for contractor yards and listed in Table 7.2-1 for appurtenant facilities.	Attachment 7b	7b-1 to 7b-285
11	Section 7.4.3 (page 7-8) – Clarify whether Tennessee Gas would use timber or board mats to prevent compaction instead of coconut fiber mats and geotextile fabric.	Where necessary timber mats will be utilized to reduce severe compaction and rutting.	7.4.3	7-8
12	Section 7.4.3 (page 7-8) – Specify at what interval Tennessee Gas would conduct soil compaction tests in agricultural and residential areas.	Compaction testing will occur in the topsoil and subsoil at regular intervals within the agricultural and residential areas disturbed by the construction activities. Compaction tests will be conducted on the same soil type under similar moisture conditions in undisturbed areas to approximate preconstruction conditions, with the use penetrometers or other appropriate devices to conduct tests. Tennessee will take readings at every 3-inch vertical interval from surface to 21 inches, or to the point of resistance (300 psi), through the topsoil and subsoil, across the Project ROW in agricultural and residential areas. These cross-section tests will be conducted at ROW inter-spacing (not to exceed 200 feet) sufficient to determine the need for remedial measures.	7.4.3	7-8
13	Section 7.5.2 (page 7-10) – Delete the word "annually" in the first sentence of this Section. Delete the word "cultivated" and replace with the word "managed" in the second sentence of this Section.	Text has been revised to state: "Topsoil segregation methods will be used in maintained lawn or landscaped areas within residential lands and on managed or rotated agricultural lands, cultivated pastures, hayfields, and other areas at the landowner's or land managing agency's request."	7.5.3	7-13
14	Section 7.5.2 (page 7-11) – Add another bullet to the first bulleted list in this section addressing stabilization of the topsoil windrow.	Additional bullet point regarding topsoil windrows has been added.	7.5.3	7-13

Comment ID	Comment	Response	Report Section	Page No.
15	Attachment 7B (page 7b-1 to 7b-101) – In Tables 7.1-1, 7.1-2, and 7.1-3, include the revegetation potential as either low, moderate, and high instead of as "yes" or "N/A" and define these ranges.	Revegetation potential will be included in the Final ER.	TBD in Final ER	N/A
16	Attachment 7B (page 7b-1 to 7b-101) – Increase the font size of the footnotes for Tables 7.1-1, 7.1-2, and 7.1-3.	Font size has been increased.	Attachment 7b	7b-238 7b-267 7b-281
17	Attachment 7B (page 7b-1 to 7b-66) – In Table 7.1-1, several soil series including but not limited to Holly Soils, Udifluvents, cobbly, and Medisaprists, ponded have a revegetation potential listed as N/A. Confirm whether or not these soil series are not revegetation potential is not applicable for each of these soil series, and, if so, identify why the revegetation potential is not applicable.	Revegetation potential will be included in the Final ER.	TBD in Final ER	N/A
18	Attachment 7B (page 7b-67 to 7b-73) – In Table 7.1-2, clarify why all aspects of the table are listed as N/A for Massachusetts, New Hampshire, and Connecticut.	Table 7.1-2 has been updated to include data for Massachusetts, New Hampshire, and Connecticut.	Attachment 7b	7b-239 to 7b-267
19	Attachment 7B (page 7b-67 to 7b-73) – In Table 7.2-1, include the type of facility (e.g., MLV, compressor station).	Facility type has been included in Table 7.2-1.	Attachment 7b	7b-283 to 7b-285
Resource Report 8 - Land Use, Recreation, and Aesthetics				
1	General – Include all information listed in Resource Report 8 as pending or "TBD" (or include a schedule for submittal), which includes, but is not necessarily limited to: a. Section 8.1.1.3 (page 8-3) – Locations of each ATWS and justifications for any modifications to FERC's Plan; b. Table 8.1-2 (pages 8-6 to 8-8) – Missing acreages for various Project facilities; c. Table 8.1-3 (pages 8-9 to 8-12) – ROW cross-section diagram; d. Section 8.1.2 (page 8-13) – Locations of aboveground and appurtenant facilities within the text, Table 8.1-5, and associated updates to Volume II, Appendix F; e. Section 8.1.3 (page 8-17) – Locations of additional pipe and contractor yards within the text, Table 8.1-6, and associated updates to Volume II, Appendices E and F; f. Table 8.1-6 (pages 8-18 to 8-19) –Locations of new contractor and pipe yards within New Hampshire, Connecticut, and Massachusetts; g. Section 8.1.4 (page 8-20) – Locations of additional access roads in section, Table 8.1-7 and Volume II, Appendices E and F; h. Section 8.1.6.1 (page 8-25) – ECPs; i. Table 8.1-11 (page 8-29) – Railroad crossings for the Project;	**a.** Locations of ATWS have been provided in Table 8.1-4. Tennessee acknowledges that the Project will require certain ATWSs to be located within 50 feet of wetlands and waterbodies. Tennessee will adhere to the BMPs outlined in its Project-specific Plan and Procedures (Volume II, Appendix H) and in the Project-specific ECPs for each state (Volume II, Appendices J, K, L, M, and N). **b.** Table 8.1-2 has been updated with acreages for all project facilities. **c.** ROW Cross Section drawings are provided in Appendix G, Typical Construction Drawings **d.** Facility locations for proposed aboveground and appurtenant facilities are included on 7.5-minute U.S. Geological Survey ("USGS") topographic quad excerpt maps and full size aerial imagery alignments. Locations and anticipated acreages of aboveground and appurtenant facilities are provided in Table 8.1-5. **e.** Locations and acreages of proposed contractor yards are provided in Attachment 8b, Table 8.1-7. Locations of proposed contractor yards are depicted on the USGS 7.5 minute topographic maps and aerial alignment sheets. **f.** Locations and acreages of proposed contractor yards are provided in Attachment 8b, Table 8.1-7. Locations of proposed contractor yards are depicted on the USGS 7.5 minute topographic maps and aerial alignment sheets. **g.** The temporary ARs are listed in Attachment 8b, Table 8.1-6, according to pipeline segment and MP. Proposed modifications to the temporary ARs are also included in Attachment 8b, Table 8.1-6. Tennessee is continuing to identify additional temporary and permanent ARs and the need for permanent ARs on other portions of the Project and will provide locations, lengths, and any proposed improvements of additional roads ARs in a revised RR8 to be submitted in the final ER. Locations of proposed ARs are depicted on USGS 7.5- minute topographic maps and aerial alignment sheets. **h.** State-specific ECPs have been provided with this filing of the ER. **i.** Table 8.1-12 has been completed.	**a.** 8.1.1.3 Attachment 8b **b.** 8.1.1.1 **c.** Vol II, App G **d.** 8.1.2 Table 8.1-5 Vol II, App E Vol II, App F **e.** Attachment 8b Vol II, App E Vol II, App F **f.** Attachment 8b Vol II, App E Vol II, App F **g.** Attachment 8b Vol II, App E Vol II, App F **h.** Vol II, App J through N **i.** 8.1.6.1.6	**a.** 8-9 8b-1 to 8b-158 **b.** 8-5 to 8-8 **c.** Volume II **d.** 8-16 to 8-19 **e.** 8b-172 to 8b-183 **f.** 8b-172 to 8b-183 **g.** 8b-159 to 8b-171 **h.** Volume II **i.** 8-30 to 8-31

Comment ID	Comment	Response	Report Section	Page No.
	j. Section 8.2.1 (page 8-31 to 8-35) –Updated correspondence with planning agencies regarding planned development and impacts and avoidance, minimization, and mitigation measures. k. Table 8.2-1 (page 8-32) – Updated information regarding locations of newly identified planned developments; l. Section 8.2.1.6 (page 8-35) –Information regarding the potential for conflicts with other construction projects; m. Table 8.2-2 (page 8-36) – Residences and commercial buildings within 50 feet of the Project workspace; n. Section 8.2.2.1 (page 8-37) – Site-specific drawings for all residences within 50 feet of the Project workspace; o. Section 8.3 (page 8-38) – Recently identified public land, recreation, and other designated areas; p. Section 8.3.1.1.1 (page 8-45) – Updated consultations with federal agencies to determine whether federal lands would be impacted by the Project; q. Section 8.3.1.1.2 (page 8-45 to 8-52) – Updated consultations with state agencies; r. Section 8.3.2.1.2 (page 8-61) – Crossing methods of scenic rivers; s. Table 8.3-2 (page 8-62) – Updated list of properties covered under NRCS and Farm Service Agency programs for New Hampshire and Connecticut; t. Table 8.3-4 (page 8-80) – New York 480/480A properties located in the vicinity of the Project; u. Table 8.3-5 (page 8-88) – Hazardous waste sites for Massachusetts;	**j.** Copies of all correspondence are provided in Volume II, Appendix B. Further contact with these agencies regarding planned developments within 0.25 mile of the compressor and meter stations will be conducted. Updated correspondence will be submitted in the final ER and provided to the Commission. **k.** Table 8.2-1 has been updated. **l.** Projects potentially contributing to cumulative impacts, including construction conflicts, are provided in Table 1.9-2 in Attachment 1b. **m.** Table 8.2-2 has been updated. **n.** Residential Construction Plans are provided in Volume II, Appendix P. **o.** Section 8.3 has been updated. **p.** Copies of all correspondence are provided in Volume II, Appendix B. **q.** Copies of all correspondence are provided in Volume II, Appendix B. **r.** Tennessee is currently evaluating appropriate crossing methods for the Westfield River and direct impacts to this Wild and Scenic River resulting from the Project has not been evaluated as of the date of this Resource Report. Tennessee will continue to coordinate with MADFW and other interested parties regarding the proposed crossing of this WMA. Tennessee is currently investigating the feasibility of an approximately 1,600-foot HDD beneath the Farmington River to avoid impacts. **s.** NRCS and FSA properties have been updated in Table 8.3-5. **t.** Tennessee is working with landowners to identify Section 480 and 480a lands. If any Section 480 and 480a properties are crossed by the Project, they will be identified and will be submitted in the final ER. **u.** Correspondence concerning hazardous waste sites in Massachusetts has not been received from the Massachusetts Department of Environmental Protection ("MADEP"). Online resources were consulted to evaluate properties within 0.25 mile of the Project area previously impacted with oil and/or hazardous materials. Information related to any identified hazardous waste sites through the online review and other information sources are included in Table 8.3-8.	**j.** Vol II, App B **k.** 8.2.1 **l.** Attachment 1b **m.** Attachment 8b **n.** Vol II, App P **o.** 8.3 **p.** Vol II, App B **q.** Vol II, App B **r.** 8.3.2.1.3 **s.** Attachment 8b **t.** TBP in Final ER **u.** 8.3.6.3 Attachment 8b	**j.** Volume II **k.** 8-34 to 8-36 **l.** 1b-1 to 1b-47 **m.** 8b-222 to 8b-234 **n.** Volume II **o.** 8-47 to 8-109 **p.** Volume II **q.** Volume II **r.** 8-88 **s.** 8b-242 to 8b-252 **t.** N/A **u.** 8-108 8b-259 to 8b-274
	v. Section 8.3.5 (page 8-92) – Information on specialty farm lands identified as crossed by the Project; w. Section 8.4 (page 8-93) –Visual resources discussion for all Project components and special recreation areas; and x. Section 8.6 (page 8-93) – Cumulative impacts associated with land use, recreation, and aesthetics.	**v.** Tennessee is continuing with environmental surveys, correspondence, and discussions with state agencies and landowners to determine the presence of organic and tree farms. Information as of the date of this resource report received to date is provided. Information concerning these farms will be submitted in Table 8.3-7 in the final ER. **w.** Visual resources for the pipeline have been discussed. A preliminary discussion of visual resource impacts associated with aboveground facilities has been included. The visual resources section will be completed in the Final ER. **x.** Cumulative Impacts associated with land use, recreation, and aesthetics has been included.	**v.** 8.3.4.3 TBP in Final ER **w.** 8.4 TBP in Final ER **x.** 8.6	**v.** 8-104 **w.** 8-109 to 8-116 **x.** 8-117 to 8-150
2	General – Revise the land use categories and definitions as listed in Section 8.1 to be consistent with the guidance in Section 8.1 of the FERC Guidance Manual for Environmental Report Preparation. The categories should include agricultural land, forest/woodlands, rangeland, open land, residential land, industrial/commercial land, and open water. Update all discussions and tables that reference land use types to include these land use categories.	Land use categories have been revised as follows: forest, agricultural, open land, commercial/industrial, wetlands, roadways and railroads, residential, other, and waterbodies.	8.1.6	8-20 to 8-32
3	Table 8.1-2 – Update the table to include acres of impacts to each land use type by Project Segment (e.g., Pennsylvania to Wright), Project component (e.g., right-of-way, ATWS, access roads, compressor stations), state, and county.	Impacts to land use are described by pipeline segment and facility in Table 8.1-1 and Table 8.1-2, respectively.	8.1.1.1	8-3 to 8-8
4	Table 8.1-3 – Update the table to include a column that identifies the existing right-of-way utility that the Project would overlap.	Table 8.1-3 provides the locations where the Project is proposed to be co-located with existing ROWs.	8.1.1.2	8-11 to 8-15
5	Section 8.1.1.2 (page 8-3) – Identify any locations where looping pipeline would be more than 25 feet from the existing pipeline. Include this information in a separate table, along with an explanation.	This comment will be addressed in the Final ER.	TBP in Final ER	N/A

Comment ID	Comment	Response	Report Section	Page No.
6	Section 8.1.2 (page 8-13) – Include the following information on aboveground facilities: a. specify whether land for aboveground facilities is currently owned or would be acquired by lease or purchase; b. identify all aboveground facilities that would be within the permanent ROW; c. identify how much land surrounding the compressor station sites would be held as a buffer and what the land use would be for the buffer following construction; d. for all new aboveground facilities that would occupy more than 5 acres, consult with the county office of the NRCS to determine the acreage of prime farmland soils that would be affected; and e. consult with the U.S. Army Corps of Engineers to determine if the new facilities would be within designated floodplain or flood storage areas. Identify mitigation is required.	**a.** Tennessee plans to secure fee property for compressor stations and sales meter stations. Sites for new meter stations and Aboveground MLVs with appurtenances will either be purchased in fee or easement. **b.** Tennessee proposed that MLVs will generally be installed and operated within the proposed permanent ROW. Pig launchers/receivers will be installed at compressor stations and the beginning and end of each of the proposed laterals and loops within permanent ROW or property owned in fee by Tennessee. **c.** Information on buffers will be provided in the Final ER. **d.** Tennessee has sited aboveground facilities outside of sensitive soils to the extent practicable. Tennessee will continue to consult with USDA-NRCS to determine the locations of agricultural preservation restrictions and conservation resource-protected lands under ALEs prior to construction to identify and determine potential impacts or alternate sites. **e.** Tennessee reviewed National Flood Insurance Program Flood Insurance Rate Maps ("FIRM") issued by FEMA to identify proposed crossings of areas subject to flooding and high volume flows. Additionally, Tennessee will continue to consult with federal, state, and local agencies to identify any other areas where flooding is a concern that may not be currently mapped by FEMA. FEMA Special Flood Hazard Areas ("SFHAs") are those areas subject to flooding by the one percent annual chance flood (100-year flood). Floodway areas are the channel of a stream plus any adjacent floodplain areas that must be kept free of encroachment so that the 1 percent annual chance flood can be carried without substantial increase in flood heights.	**a.** 8.1.2 **b.** 8.1.2 Vol II, App E Vol II, App F **c.** TBP in Final ER **d.** 7.2 **e.** 2.2.9	**a.** 8-9 **b.** 8-9 to 8-10 Volume II **c.** N/A **d.** 7-4 **e.** 2-52 to 2-60
7	Section 8.1.3 (page 8-17) – If additional pipe and contractor yards are unknown or are not yet established, identify the yard requirements, approximate locations, and the anticipated number of additional yards that would be needed.	Tennessee has identified 119 contractor yards for the proposed Project, which are listed in Table 8.1-7. Tennessee is in the process of contacting these landowners and obtaining permission to utilize these areas. Locations of proposed contractor yards are depicted on the USGS 7.5 minute topographic maps and aerial alignment sheets.	Attachment 8b Vol II, App E Vol II, App F	8b-172 to 8b-183
8	Table 8.2-1 – Update the table to include all ongoing or planned projects within 0.25 mile of the Project workspace instead of the Project centerline.	Table 8.2-1 has been updated.	8.2.1	8-34 to 8-36
9	Identify any open pit mines or nuclear facilities within ½ mile of the Project facilities.	Open pit mines are included in Resource Report 6.	6.3	6-37 to 6-47
10	Table 8.2-2 – Update the table to include all residences, commercial buildings, and structures (e.g., sheds, pools, barns, garages) within 50 feet of construction workspace. Include a column for county and state for each residence, building, and structure.	Table 8.2-2 has been updated.	Attachment 8b	8b-222 to 8b-234
11	Section 8.2.2.1 (page 8-37) – Describe how landowners would be notified of construction activities and how hazards from open ditches would be minimized when active construction is not occurring. Describe whether the pipeline centerline would occur within 25 feet of a residence. If this could occur, describe the procedures that would be followed to ensure that the trench would not be excavated until the pipe is ready for installation and that the trench is backfilled immediately after installation.	Land agents will contact landowners during the construction process to advise them of the schedule for construction. Tennessee's planned work schedule will be 6 days per week/10 hours per day during daylight hours. Traffic control personnel may be employed during construction activities to allow for traffic flow and local access for emergency vehicles, if required. Emergency vehicle access will be maintained during construction by the use of temporary travel lanes or steel plate bridges during open trenching to allow normal traffic flow. The majority of pipeline trenching, installation, and backfill activities are anticipated to be completed on a daily basis, and minimal open trench will be maintained. with the frequent use of water trucks will be used to regularly spray down the construction area, as needed, to control dust, and the strict enforcement of speed limits for construction equipment and associated vehicles will be strictly enforced.	8.2.3	8-47
12	Section 8.3 (pages 8-38 to 8-93) – Include the results of consultations and coordination with agencies and landowners. For public lands, summarize the status of the negotiations for the special-use permits or right-of-way grants.	Tennessee is in the process of acquiring all necessary easements from affected landowners to construct the Project facilities. Additionally, Tennessee will acquire all necessary permits and approvals, as detailed in Resource Report 1 of this ER, prior to commencement of construction. A list of agencies contacted for information, consultation, or technical assistance during preparation of this ER and copies of all correspondence received since Tennessee's March 2015 filing through May 1, 2015 is provided in Volume II, Appendix B. Any additional correspondence received from these agencies will be submitted in the final ER or subsequent filings as necessary.	8.3.7 Vol II, App B	8-109

Comment ID	Comment	Response	Report Section	Page No.
13	Section 8.3 (pages 8-38 to 8-93) – Describe the types of mitigation measures expected to be implemented to avoid or minimize impacts on public lands, recreation areas, and other special land.	Tennessee is continuing ongoing discussions with state agencies to develop mitigation measures that will minimize impacts to public lands and recreation areas. Copies of all correspondence are provided in Volume II, Appendix B.	8.3 Vol II, App B	8-47 to 8-109
14	Section 8.3 (pages 8-38 to 8-93) – For each special recreation area affected, identify the primary uses, peak use periods, and any seasonal restrictions.	Information about recreation areas potentially impacted by the project has been provided.	8.3	8-47 to 8-109
15	Section 8.3.1.1 (page 8-38) – The text states that "Initial tree felling on these lands will likely occur in the first quarter of 2017" (italics added). Describe what mitigation would be implemented if this schedule is not adhered to.	If Tennessee is unable to begin felling trees in the first quarter of 2017, Tennessee will consult with applicable federal and state agencies to create an updated schedule. Tennessee will submit a Winter Construction Plan in a subsequent filing of the ER in the event that construction occurs during winter.	TBP in Final ER	N/A
16	Section 8.3.4 (page 8-92) – Include details regarding the status and consultations for the coastal zone consistency application for the New York State Department of State.	Correspondence was sent to the PADEP Coastal Resources office, NYSDEC Coastal Management Program, MADCR, and CTDEEP concerning potential coastal zone ("CMZ") management areas. Information was received from the CTDEEP which stated that the Project lies completely outside of the Connecticut Coastal Management Zone ("CCMZ"). From a review of online information for the other states, the only state where the Project is located inside a CCMZ are is New York. Tennessee is seeking a CMZ consistency determination from NYSDOS. Tennessee will prepare a document to demonstrate compliance with the 44 coastal policies for submission to NYSDOS. This will be submitted as part of a Joint Permit Application to the U.S. Army Corps of Engineers ("USACE"), NYSDEC, NYSDOS, and NYS Office of General Services ("NYSOGS").	8.3.5	8-106
17	Identify all conservation lands affected by permanent or temporary right-of-way, identify type, and acres by county.	All conservation lands have been identified and discussed in Resource Report 8 and are provided in Table 8.3-1.	8.3.1 Attachment 8b	8-48 to 8-80 8b-235 to 8b-241
18	Section 8.4 (page 8-93) – Include in the visual resources discussion the following details: a. a discussion of visually sensitive areas in the vicinity of pipeline crossings and aboveground facilities; b. use established visual classification systems where appropriate to quantify potential impacts; and c. for all designated or sensitive scenic areas, address mitigation proposed to reduce visual impacts.	Visual resources for the pipeline have been discussed. A preliminary discussion of visual resource impacts associated with aboveground facilities has been included. The visual resources section will be completed in the Final ER.	8.4 TBP in Final ER	8-109 to 8-116
Resource Report 9 - Air and Noise Quality				

Comment ID	Comment	Response	Report Section	Page No.
1	General – Include all information listed in Resource Report 9 as pending or "TBD" (or include a schedule for submittal), which includes, but is not necessarily limited to: a. direct and indirect estimated per year criteria pollutant and greenhouse gas (GHG) emissions from construction of the Project by state; as well as assumptions, data, and emission factors; b. criteria emissions and GHG emissions from construction per year for all nonattainment counties; as well as assumptions, data, and emission factors; c. air emission estimates for the compressor stations for all criteria pollutants, speciated hazardous air pollutants, and greenhouse gases; d. fugitive methane emissions from aboveground facilities (compressor stations, meter/regulation stations, valves, pig launcher/receivers, as well as estimated methane losses from the pipeline per year. e. dispersion modeling to estimate air concentrations resulting from compressor stations, and demonstration of compliance with the NAAQS; f. discussion on air regulatory requirements to which the Project would be subject; g. ambient noise surveys for each compressor station location and meter stations (meter stations with homes within ½ mile), h. acoustical analysis to determine the noise contribution at each NSA for each compressor stations; i. construction noise impacts at compressor stations and meter and regulation stations at nearest NSAs; j. compressor station noise mitigation requirements; k. applicable state and local noise ordinances at compressor station locations;	**a.** The estimated per year emissions for construction of the project facilities are summarized in Tables 9.1-14, 9.1-15, and 9.1-16. **b.** For all applicable nonattainment and maintenance areas, emissions from construction of the aboveground facilities and pipeline will be aggregated to compare against the general conformity de minimis emission thresholds. These emissions totals are provided in Tables 9.1-18, 9.1.19, and 9.1.20 with totals separated per year of construction. **c.** Detailed air emissions for the compressor stations will be provided in the Final ER. **d.** Methane emissions will be provided in the Final ER. **e.** Dispersion modeling will be conducted to support the air permit applications and results will be provided in the Final ER. **f.** Air regulatory requirements have been added to the report. **g.** Baseline noise surveys were conducted at all nine of the new compressor station sites to determine NSAs and the existing sound levels, in dBA Ldn, at each NSA. Attachment 9a, Figure 9.2-1 through Figure 9.2-10, show the distances and directions of the NSAs to the respective compressor stations. Baseline noise survey results for each compressor station are summarized and presented in data tables, which are included in the following sub-sections. The details of these baseline sound surveys will be included in the Final ER. Baseline noise levels at the existing Station 319 were taken from previous FERC filings. **h.** An acoustical analysis will be performed to determine the estimated compressor station noise contribution at each NSA for all compressor stations. The analysis methodology, source sound level data, and proposed noise control treatments for each compressor station will be included in the Final ER. **i.** Noise impacts due to construction of the new and modified compressor stations and meter stations will be determined at the nearest NSAs, taking into account construction schedule and planned equipment. The analysis and results will be included in the Final ER. **j.** A summary of the existing noise levels, operation noise impacts, and proposed noise mitigation for each compressor station will be submitted in the final ER. **k.** State and local noise ordinances have been provided for each state, county, and town/township, where applicable.	**a.** 9.1.3.1 **b.** 9.1.3.3 **c.** TBP in Final ER **d.** TBP in Final ER **e.** TBP in Final ER **f.** 9.1.2 **g.** 9.2.2 Attachment 9a TBP in Final ER **h.** TBP in Final ER **i.** TBP in Final ER **j.** TBP in Final ER **k.** 9.2.1.2	**a.** 9-24 **b.** 9.26 to 9-29 **c.** N/A **d.** N/A **e.** N/A **f.** 9-14 to 9-23 **g.** 9-35 to 9-50 Attachment 9a **h.** N/A **i.** N/A **j.** N/A **k.** 9-32 to 9-35
	l. proposed modifications or proposed equipment at all meter and regulation stations; m. location of all HDD sites, ambient noise survey and the noise impacts of these locations with NSAs within ½ mile; and length of time of drill; n. noise survey and acoustical analysis at each HDD entry and exit site; o. noise mitigation requirements for each meter station, including baseline noise surveys; p. blowdown silencer performance targets along with estimated sound level contribution at each NSA; and q. discussion of the Project's cumulative analysis as identified in our February 27, 2015 comment letter.	**l.** An acoustical analysis will be performed to determine the estimated meter station noise contribution at each NSA for all meter stations. Noise mitigation requirements will be determined during the analysis to determine how each meter station will meet regulatory requirements. This analysis will be included in the Final ER. **m.** An acoustical analysis will be performed to determine the estimated HDD noise contribution at each NSA for all entry and exit sites. Noise mitigation requirements will be determined during the analysis to determine how each HDD site will meet regulatory requirements. The analysis methodology, source sound level data, and proposed noise control treatments for each HDD crossing will be detailed in the final ER. **n.** An acoustical analysis will be performed to determine the estimated HDD noise contribution at each NSA for all entry and exit sites. Noise mitigation requirements will be determined during the analysis to determine how each HDD site will meet regulatory requirements. The analysis methodology, source sound level data, and proposed noise control treatments for each HDD crossing will be detailed in the final ER. **o.** An acoustical analysis will be performed to determine the estimated meter station noise contribution at each NSA for all meter stations. Noise mitigation requirements will be determined during the analysis to determine how each meter station will meet regulatory requirements. Results of the analysis and mitigation requirements will be included in the Final ER. **p.** Blowdown silencer performance targets will be determined and presented in the Final ER. **q.** Tennessee is in the process of conducting the Project's cumulative impact analyses for air and noise resources, including the resource-specific temporal and geographic scope within which cumulative impacts may occur from the construction and operation of the Project. Tennessee will provide a discussion on cumulative impacts associated with air and noise in the final ER.	**l.** TBP in Final ER **m.** TBP in Final ER **n.** TBP in Final ER **o.** TBP in Final ER **p.** TBP in Final ER **q.** TBP in Final ER	N/A

Comment ID	Comment	Response	Report Section	Page No.
2	Section 9.1, Table 9.1-1 (page 9-2) – Include the ambient air quality standard for lead, and both 1997 and 2008 standards for ozone.	Table 9.1-1 has been updated.	9.1	9-2
3	Section 9.1.1.2 (pages 9-5 to 9-8) – Update the existing ambient air quality discussion to include the distance and direction to the cited monitoring stations from each compressor station.	Section will be updated in the Final ER.	TBP in Final ER	N/A
4	Section 9.1.1.2 (pages 9-9 to 9-12) – Verify whether or not there are any maintenance areas in the Project area and for which pollutant. If there are maintenance areas in the Project area, include a discussion of provisions that would be applicable within the maintenance area, or verify that no related provisions would apply to the Project.	Maintenance areas are identified in Tables 9-1-9 through 9.1-13.	9.1.1.2	9-9 to 9-14
5	Section 9.1.2.1 (page 9-13) – Include the distance to the nearest federal Class I area from each compressor station, and discuss potential impacts and mitigation.	There are no Class I or Class III increments in effect for the Project area. The closest Class I areas to the Project area the Lye Brook Wilderness Area in southwest Vermont and the Great Gulf Wilderness and Presidential Range Dry River Wilderness Areas in northern New Hampshire.	9.1.2.1	9-15
6	Section 9.1.2.5.5 (page 9-21) – Include a discussion of any Connecticut state air quality provisions for construction emissions.	There are no planned Project facilities in Connecticut that would be subject to air permitting.	9.1.2.5.5	9-23
7	Section 9.1.3.1 (page 9-21) – Verify whether or not there would be open burning. If so, include emissions estimates in construction emissions.	Open burning will not be conducted. Thus, additional particulate emissions from this type of activity were not calculated.	9.1.3.1	
8	Section 9.1.3.3 (page 9-25) – Include construction emissions by county for all maintenance or nonattainment areas.	For all applicable nonattainment and maintenance areas, emissions from construction of the aboveground facilities and pipeline will be aggregated to compare against the general conformity de minimis emission thresholds. These emissions totals are provided in Tables 9.1-18, 9.1.19, and 9.1.20 with totals separated per year of construction.	9.1.3.3	9-26 to 9-29
9	Section 9.2.2 (page 9-32) – Include identification of NSA's within one mile of each compressor station.	NSAs within one mile of each compressor station are provided in Section 9.2.2 and shown in figures in Attachment 9a.	9.2.2 Attachment 9a	9-35 Attachment 9a
10	Section 9.2.2.2.1 (page 9-32) – When conducting the acoustical analysis for existing conditions at the existing compressor station, ensure that the existing compressors are operating at full load.	The reported existing sound levels include the operation of Station 319 at full load, as well as other ambient sounds.	9.2.2.1.1	9-36
11	Section 9.2.4 (page 9-67) – Include methods to mitigate noise and vibration impacts on NSAs in the Project Blasting Plan.	Blasting noise impact will be mitigated as necessary by one or more of the following: • Using reduced energy charges with greater distribution if practicable; and • Restricting the time of day or season of the year for blasting. Each area determined to require blasting will have a site-specific blasting plan. This plan will include measures to mitigate noise and vibration impacts on the NSAs.	9.2.4.4 Vol II, App J through N, Attachment 8	9-79 to 9-80
12	Section 9.2.6 (page 9-73) – Include a description of the likelihood of a pipeline blowdown event. This discussion should include the cause and frequency of a blowdown event, the approximate time it would take to evacuate gas from the pipeline, and the potential noise associated with the MLV based on the nearest NSA's distance from the noise source.	Noise from gas blowdown events will be considered for the compressor stations, including the following two blowdown types: • Unit blowdown – a routine gas blowdown, vented via a silencer, that can occur when a compressor is stopped and gas between the suction/discharge valves and compressor(s) is vented to the atmosphere through a blowdown silencer, and • Station blowdown – a gas blowdown, vented via a silencer, that occurs when all of the station piping is depressurized.	9.2.6	9-82

Comment ID	Comment	Response	Report Section	Page No.
13	13. Provide an air quality screening (AERSCREEN) or refined analysis (AERMOD or EPA-approved alternative) of the Station 319 compressor station demonstrating that the incremental increase in emissions of criteria pollutants do not result in local exceedance of the National Ambient Air Quality Standards (NAAQS); state ambient air quality standards; or cause or contribute to additional violations of the NAAQS. This modeling should: a. identify existing emission rates of criteria pollutants from the station, and provide modeling results to identify existing local impact levels of criteria pollutants; and b. identify proposed emission rates of criteria pollutants from the station and provide modeling results to identify the local impacts of the new turbines in addition to the existing equipment at the compressor station. c. Include all input parameters (emission rate, stack height, stack temperature, exit velocity, etc.) and justify bases for any assumptions. Provide a narrative describing and justifying the modeling basis, and all inputs (meteorological data, terrain data). For any mitigation measures, or air pollution control equipment, provide data to justify control efficiency. Provide output data showing maximum impacts outside the fenceline (the EPA-defined ambient air boundary), and at sensitive receptors in the area (schools, hospitals, nursing homes, etc.).	No additional horsepower installed at Station 319. There will not be any incremental increase in air emissions.	9.1	9-3
Resource Report 10 - Alternatives				
1	General – Include all information listed in Resource Report 10 as pending or "TBD" (or include a schedule for submittal), which includes, but is not necessarily limited to: a. locations and details for alternative compressor station, meter station, mainline valves, and contractor yard sites; b. additional evaluation of major and minor route alternatives, and minor route deviations; and c. information regarding Article 97 properties, including information from state agencies.	**a.** Alternative sites for Compressor Stations have been provided. Alternative sites for meter stations and contractor yards will be provided in the Final ER. **b.** Additional information regarding major and minor route alternatives have been provided. **c.** Article 97 Avoidance and Co-location Alternatives have been discussed.	**a.** 10.5 TBP in Final ER **b.** 10.3 **c.** 10.3.1.10	**a.** 10-76 to 10-82 **b.** 10-18 to 10-74 **c.** 10-51 to 10-52
2	Section 10.1 (page 10-2) – List the "other shippers" mentioned in Section 10.1.	Other shippers will be identified in the Final ER.	TBP in Final ER	N/A
3	Section 10.1 (page 10-2) – Include an evaluation of the facilities, equipment, and processes that would be required to transport a Project-equivalent volume of natural gas from the supply area to the destination locations via alternative modes such as truck and rail.	Based on commercially available CNG jumbo tube trailers, such as Marlin CNG Services, located in Hudson, FL, a daily total of 7,831 truckloads of CNG would be required to supply the NED Market capacity of 1.3 BCFD. This is based on each jumbo tube trailer holding 166 MCF at 3000 psig. Marlin would provide a regulation skid to deliver the gas at the required delivery pressure. Note that Marlin owns 35 tanker trucks. Even if Marlin owned 4,000 trailers (which I doubt there are 4000 CNG trailers in the US), which would allow filling the tanks twice per day to reach the required 7,831 loads, the time required to load (2 hours minimum), transport, deliver, driving to the fill point, load, transport & deliver is not physically possible in a day's time assuming the load point is a producing facility in the Merseles area and since all 4000 trailers would not be able to instantly deliver its load once it arrived at a delivery point. Based on a tractor trailer length of 55' for each load of CNG, 4,000 truckloads would stretch 42 miles if placed end to end. Therefore, this is not a reasonable alternative.	N/A	N/A
4	Section 10.3 (page 10-14) – Include data categories in all alternatives comparison tables for streams with drinking water use designation, important bird areas, and Audubon forest blocks of importance.	To be updated in the Final ER.	TBP in Final ER	N/A
5	Section 10.3.1 (page 10-25) – Include a detailed analysis specifically assessing alternative crossing locations for the Appalachian Trail to minimize impacts.	To be updated in the Final ER.	TBP in Final ER	N/A
6	Section 10.3.1.8 (page 10-40) –Describe potential impact avoidance (such as HDD), minimization, and mitigation measures that could be used to address impacts to Article 97 properties.	Tennessee is minimizing potential impacts to Article 97 lands by co-locating with existing utilities. Tennessee is continuing to consult with MA to determine mitigation measures. Article 97 Avoidance and Co-Location Alternatives are discussed in Section 10.3.1.10.	10.3.1.10	10-51 to 10-52

Comment ID	Comment	Response	Report Section	Page No.
7	Figure 10.2-5 and Figure 10.3-5 – Add the Portland Natural Gas System (and other applicable figures), and clarify a potential mapping error for Figures 10.3-5 and 10.3-7 (the alternative routes depicted appear to be identical).	Figures have been updated.	Attachment 10a	Attachment 10a
8	Provide a discussion of the feasibility of using electric-motor-driven compressors at the proposed new compressor stations. Provide the rate of electricity required and the number of electric motors required. Compare the size of the electric transmission line necessary under the current proposal with what would be required for the electric motors.	Comment will be addressed in the Final ER.	TBP in Final ER	N/A
9	Include in a table similar to table 10.3-10, a comprehensive list, assessment, and conclusion for all stakeholder-requested minor route deviations filed at any time in the pre-filing docket. Also include in the list any stakeholder comments where a minor route deviation may not be specifically requested, but where a specific resource concern (e.g., Project proximity to a home, well, spring, wetland, future residential development, etc.) is identified that would potentially benefit from a resource avoidance/impact minimization analysis by Tennessee Gas. Evaluate routing, workspace, and construction method alternatives as appropriate. The analysis should be based on direct stakeholder discussions and on-site evaluations, if the landowner is willing, and on available desktop imagery and data if landowner access is denied. At a minimum, the table should include columns for tract/parcel number, segment identification and milepost, description of the requested minor route deviation, Tennessee Gas's assessment of and conclusion for the minor route deviation (including adequate descriptive text as well as comparison tables and maps where appropriate), and a statement regarding whether the stakeholder's routing concerns have been resolved. Also, provide an identical table listing stakeholder routing and/or resource avoidance concerns reported to Tennessee Gas, but which do not appear within comments filed to the PF docket.	Tennessee has evaluated route deviations to significant resources identified through stakeholder comments and has included those in Table 10.3-14. Throughout the ER, Tennessee has identified sensitive resources that may be impacted by the project and avoided or mitigated impacts.	10.3.3.1	10-67 to 10-74
10	Identify any structural or engineering changes on the existing 200 Line, that could accommodate all or a portion of the NED planned gas volumes. This may include, but should not be limited to: additional compression, pipeline uprates, replacements, looping or a combination of these.	Tennessee considered expansion along its existing 200 Line via looping and compression; however, given the large project volumes, the looping became a contiguous new line and morphed into the Existing 200 Line Alternative as described in Section 10.3.1.4.	10.2.1	10-10

Comment ID	Comment	Response	Report Section	Page No.
11	Prepare additional environmental, engineering, and economic analysis of the (1) Existing Line 200 Alternative combined with the New York Alternative and (2) Massachusetts Turnpike Alternative combines with the New York Alternative. The analysis should include the following information so that a quantitative comparison can be made with Tennessee Gas' planned route: a. identify the total length of each pipeline alternative in miles; b. the temporary and permanent acreage impacted by land use/vegetation type; c. identify the number of contiguous forest tracts greater than 100 feet long; d. identify the number of landowners affected; e. identify threatened and endangered species critical habitat that the pipeline would traverse, or would be within ¼ mile of the right-of-way; f. the number of residents within 50 feet of the edge of the construction ROW; g. identify the number of Major rivers (greater than100 feet); Intermediate streams/rivers (between10-100 feet); number of warm water and cold water fisheries; and wild and scenic rivers; h. delineate the wetland linear feet and acreage by wetland type, identify those dominated by exotic non-native species; i. identify what facilities are defined as "environmental hazards". Narrow the focus radius to ¼ mile around the pipeline ROW. j. identify mines, quarries, and other geological hazards within ¼ mile of the pipeline ROW; k. identify any scenic areas, or historic viewsheds that the alternatives would cross; l. provide information for evaluation of environmental justice concerns such as: low-income populations, minority populations, or tribal communities; m. identify the number, relative locations, and horsepower of compressor stations that would be required for the alternative;	Tennessee has evaluated two additional major route alternatives using readily available public databases: (1) Combined New York and Existing Line 200 Alternative and (2) Combined New York and Mass Turnpike Alternative. Additional information will be provided in the Final ER.	10.3.1.8 10.3.1.9 TBP in Final ER	10-44 to 10-47 10-47 to 10-50
	n. identify on a map what laterals would be required to meet delivery points, if different than the planned current laterals; and o. Provide mapping of each alternative using the most up to date U.S. Geological Survey 7.5-minute-series topographic maps with mileposts; maps from the Massachusetts Office of Geographic Information (MASSGIS) system; and current aerial photography.. The above information should include all assumptions, (ex. 50 foot permanent ROW, overlap with existing ROW, etc.)			
Resource Report 11 - Reliability and Safety				
1	General – Include all information listed in Resource Report 11 as pending or "TBD" (or include a schedule for submittal), which includes, but is not necessarily limited to US DOT class locations and high consequence areas.	Class locations for the project have been provided in Table 11.2-1 in Attachment 11a. High Consequence Areas will be provided in the Final ER.	Attachment 11a TBP in Final ER	11a-1 to 11a-7 N/A

Comment ID	Comment	Response	Report Section	Page No.
2	Section 11.2.1 (page 11-2) – Describe how Tennessee Gas would monitor for changes in population density around the pipeline. If population density changes such that higher classification standards of safety must be met, discuss how and when Tennessee Gas would be required to meet the new standards.	Tennessee monitors for changes in the number of homes and businesses to determine if densities change such that the HCAs or class locations would also change. Structure changes are observed by Tennessee employees during routine operations and maintenance activities and regular aerial patrols as part of our continuing surveillance activities of the pipeline. Structure changes observed and reported include structure additions, structure removals, changes in structure occupancy or purpose and changes to "well defined" areas such as playgrounds, recreational areas and any areas of public assembly that are within approximately 660 feet from the center of the pipeline, consistent with Department of Transportation Pipeline and Hazardous Materials Safety Administration ("PHMSA") 49, CFR Part 192. In addition, each calendar year (and not to exceed 15 months) a structure survey is conducted to confirm all structure changes have been submitted since the last survey conducted in the previous year. As structures are submitted, they are entered into Kinder Morgan's Pipeline Compliance System database to verify the data and determine if there are any Class (population density) changes that would initiate a review of the safety design factors and MAOP for the segment of pipe impacted by the Class change.	11.2.1	11-5
3	Section 11.2 (page 11-2) – Describe any Project safety features that would result in facilities or measures that are more stringent than required by the U.S. Department of Transportation.	The proposed Project facilities will be designed, constructed, operated, and maintained in accordance with the USDOT federal safety standards, Title 49 CFR Part 192. All of the safety features in place meet these standards. The regulations are intended to ensure adequate protection for the public from natural gas pipeline failures. Part 192 specifies material selection and qualification, design requirements, and protection from internal, external, and atmospheric corrosion. Tennessee's minimum specifications for depth of cover would exceed the USDOT requirements for Class 1 locations specified in 49 CFR Part 192, Section 192.327. Odorization requirements set forth in 49 CFR Part 192, Section 192.625, depend on Class Locations. Will review these requirements once Class Locations are received, and once Tennessee verifies odorization locations, to determine if the USDOT requirements are exceeded. The pipeline complies with the USDOT requirements in 49 CFR Part 192 Section 192.451, including the external coating, cathodic protection, and inspection requirement.	11.2.1 11.2.2 11.2.3	11-2 to 11-7
4	Section 11.2.1 (page 11-4) – Clarify whether each of the MLVs would be automated and/or remotely controlled.	All newly installed MLVs will be remotely controlled.	11.2.1	11-6
5	Section 11.2.2 (page 11-6) – Specify each segment of the Project's mainline pipeline and laterals that would have odorized gas, and identify the odorization location.	Tennessee's existing 200 Line is currently odorized at Station 245. Tennessee's existing 300 Line is currently odorized at Station 321. As such, Loop 317-3 and Loop 319-3 will not be odorized. New odorization facilities will be installed at the Supply Path Tail Station on the Pennsylvania to Wright Pipeline Segment (New York Portion) Segment E, MP 44.10, in Schoharie, New York. The approximately 7 miles of pipeline between the Supply Path Tail Station and Wright in New York will be odorized. The approximately 187.77 miles of pipeline between Wright and Dracut will also be odorized. The Maritimes Delivery Line, Concord Delivery Line, Lynnfield Lateral, Peabody Lateral, Haverhill Lateral, Fitchburg Lateral Extension and 300 Line CT Loop will each be odorized.	11.2.2	11-6 to 11-7

Comment ID	Comment	Response	Report Section	Page No.
6	Section 11.2.5 (page 11-7) – Describe the location of Tennessee Gas's area offices along the Project facilities which can provide a "quick response to any emergency situations" and indicate what the expected maximum response times would be. Further, clarify if these personnel would be available at all times.	Tennessee field personnel are available to respond to emergency events on its pipeline system at any time of day. Typically, the response time is less than one hour, but is dependent on the location of the situation, location of personnel, time of day, weather conditions, and traffic conditions. Tennessee's Gas Control Center can react to any emergency pipeline condition immediately by remotely opening or closing valves to shut down or activate necessary pipeline facilities to control the event. There are several existing facilities in the Project area within approximately 60 minutes or less of driving time that will also provide support in emergency situations as well as for routine operations. The locations are as follows; Wyalusing, Pennsylvania, Clifford, Pennsylvania, West Winfield, New York, Carlisle, New York, Nassau, New York, Agawam, Massachusetts, Hopkinton, Massachusetts, Pelham, New Hampshire, and Enfield, Connecticut. Currently, Tennessee Gas has 59 employees that support the locations mentioned above. In addition, Tennessee will have personnel supporting the new compressor stations proposed at the following locations that would be available for emergency response; New Milford, Pennsylvania, Franklin, New York, Schoharie, New York, Wright, New York, Nassau, New York, Windsor, Massachusetts, Northfield, Massachusetts, New Ipswich, New Hampshire, and Dracut, Massachusetts. Tennessee Gas estimates adding 26 employees that support the locations mentioned above.	11.2.5	11-7 to 11-9
7	In responding to landowner concerns, indicate whether Tennessee Gas would voluntarily construct the pipeline to a higher US DOT Class location category in any area where a residence would be within the potential impact radius.	Tennessee will comply with all requirements set forth in 49 CFR Part 192.	11.2.1	11-2 to 11-6
Volume II Appendix F - Alignment Sheets				
1	The following are general inconsistencies in the alignment sheets: a. Overhead transmission lines are not documented on map; and b. In general, there are several instances where the proposed access roads do not intersect with the ROW or centerline of the Project. These have been identified as roads that were likely used for the Constitution or adjacent projects. Lengths and acreages (as well as display on maps) should be adjusted to show full extent and connection with new ROW for the Project.	Alignment sheets have been updated.	Vol II, App F	Volume II
2	The following are inconsistencies between Table 2.3-1 and the alignment sheets: a. Wetland BD-K-W008 (PFO) at MP 8.46 is labeled in the alignment sheet as "Wetland." Please add Wetland ID to the label in the alignment sheet. b. Wetland BD-K-W004 does not appear to be impacted in the alignment sheet, but appears in Table 2.3-1. Please confirm.	Alignment sheets have been updated.	Vol II, App F	Volume II
3	In Table 2.3-1, Wetland BD-M-W008-PEM is labeled as BD-M-W008.	Alignment sheets have been updated.	Vol II, App F	Volume II
4	Please identify the two "unknown" wetlands in Table 2.3-3 in Segment F at MP 21.28 and 21.48.	Alignment sheets have been updated.	Vol II, App F	Volume II
5	The NWI wetland at MP 22.3 in Segment F in the alignment sheet does not have a wetland ID and does not appear in Table 2.3-3.	Alignment sheets have been updated.	Vol II, App F	Volume II
6	Wetland AL-D-W026 appears in the alignment sheet as being impacted by ATWS, but does not appear in Table 2.3-3.	Alignment sheets have been updated.	Vol II, App F	Volume II
7	Identify "unknown" wetland in Table 2.3-3 in Segment F at MP 26.89.	Alignment sheets have been updated.	Vol II, App F	Volume II
8	Wetland RE-L-W002 does not appear to be impacted in the alignment sheet, but appears in Table 2.3-3. Please confirm.	Alignment sheets have been updated.	Vol II, App F	Volume II

Comment ID	Comment	Response	Report Section	Page No.
9	Wetland NWI-157 does not appear to be impacted in the alignment sheet, but appears in Table 2.3-5. There is a wetland with no ID being impacted at approximately the same point that does not appear in Table 2.3-5. Please confirm.	Alignment sheets have been updated.	Vol II, App F	Volume II
10	The 'Begin Milepost' values for NWI-616 and NWI-617 for Segment K are incorrect.	Alignment sheets have been updated.	Vol II, App F	Volume II
11	Wetland NWI-619 does not appear to be impacted in the Alignment Sheet, but appears in Table 2.3-5. Please confirm.	Alignment sheets have been updated.	Vol II, App F	Volume II
12	The pages in the alignment sheets for Segment P are out of order.	Alignment sheets have been updated.	Vol II, App F	Volume II
13	Wetland NWI-755 in Table 2.3-5 beginning at MP 4.25 is labeled as Wetland NWI-751 in the alignment sheets. Please address this discrepancy.	Alignment sheets have been updated.	Vol II, App F	Volume II
14	An NWI wetland appears to be impacted by the ATWS at the end of Segment Q, but is not labeled and does not appear in Table 2.3-5.	Alignment sheets have been updated.	Vol II, App F	Volume II
15	There are a number of NWI wetlands that are impacted by workspaces but are not labeled with a unique ID and do not appear in Table 2.3-7.	Alignment sheets have been updated.	Vol II, App F	Volume II
16	Wetland WI-P-W002 at MP 13.67 of Segment S does not appear in Table 2.3-9.	Alignment sheets have been updated.	Vol II, App F	Volume II
17	Update the alignment sheets to include the following information regarding ATWSs: a. all ATWSs should be labeled with a unique identifier, as listed in Table 8.1-4; b. depict the full dimensions of each ATWS in the alignment sheets consistent with what is listed in Table 8.1-4;	Alignment sheets have been updated.	Vol II, App F	Volume II
18	The following are inconsistencies between Table 8.1-7 and the alignment sheets: a. Segment B: "AR 23 - TGP 300" does not connect to an existing road or other feature and is viewed as hanging out in empty space. Update to connect to existing infrastructure and update length and acreage; b. Segment C: i. "AR 34 – CON" does not connect to an existing road. Update to connect to existing road surfaces and update length and acreage accordingly; ii. "AR 36 – CON" and "AR 37 – CON" are in close proximity. Verify that both features would be utilized; c. Segment D: i. "AR 72 – CON" is listed in the table but not shown on map; ii. "AR 73 – CON" extends past ROW. Verify length and acreages to ensure that only required distance is represented and update alignment sheet; d. Segment E: "AR 98 – CON" shown on table but not found in the alignment sheets; e. Segment F: i. "AR 109 – TGP 200" does not connect with ROW centerline. Update and revise length and acreage accordingly so that the road reaches the construction area; ii. "AR 110 – TGP 200" does not connect with ROW centerline. Update and revise length and acreage accordingly so that the road reaches the construction area; iii. "AR 111 – TGP 200" does not connect with ROW centerline. Update and revise length and acreage accordingly so that the road reaches the construction area; iv. "AR 118A – TGP 200" does seem necessary since it overlays an existing road "Pitcher Lane." Confirm that the road would be utilized; v. "AR 124 – TGP 200" does not connect with ROW centerline. Update and revise length and acreage accordingly so that the road reaches the construction area;	Alignment sheets have been updated.	Vol II, App F	Volume II

Comment ID	Comment	Response	Report Section	Page No.
	vi. "AR 134 – TGP 200" does not connect with ROW centerline. Update and revise length and acreage accordingly so that the road reaches the construction area; vii. "AR 135A – TGP 200" does not connect with ROW centerline. Update and revise length and acreage accordingly so that the road reaches the construction area; viii. "AR 139A – TGP 200" does not connect with ROW centerline. Update and revise length and acreage accordingly so that the road reaches the construction area; f. Segment S: "AR 317A – TGP 300" and "AR 317B – TGP 300" are occurring on opposite sides of the ROW at the same MP. Confirm that both options would be utilized; and g. Segment T: "AR 323 – TGP 300" extends past ROW. Verify length and acreages to ensure that only required distance is represented and update alignment sheet.	Alignment sheets have been updated.	Vol II, App F	Volume II
19	The following are inconsistencies between Table 8.1-9 and the alignment sheets: a. Segment A: i. General – Driveways are not consistently identified in the table or in the alignment sheets; ii. "Unknown Road" at MP 2.57 identified in table, but not in the alignment sheets; iii. Apparent unidentified crossing near MP 22.7. Feature is visible in imagery but identified in table or in alignment sheets; b. Segment B: i. "Private Road" near "AR 25 – TGP 300" is not identified in the table; ii. General – Driveways are not consistently identified in the table or in the alignment sheets; c. Segment C: i. Crossing of "Driveway" at MP 2.21 reported in table but no identification in the alignment sheets; ii. Driveway crossed at MP 8.6 not identified in table or in the alignment sheets but is visible in imagery; iii. "Road No. 171" crossed at MP 34.9 identified in the alignment sheets but not found in table; d. Segment D: i. Driveway crossed at MP 11.5 not identified in table or in alignment sheets but is visible in imagery; ii. Second crossing of "Bundy Hollow Road" at MP 23.25 visible in the alignment sheet but not identified in table; iii. Driveway crossed near MP 40.0 not identified, but visible in imagery; e. Segment E: Sheet 22 of file 2 of 2, has an errant placeholder label "XXXX"; f. Segment F: i. "Unknown Road" crossing at MP 1.64 not shown in the alignment sheet; ii. Crossing of "Pitcher Lane" at MP 10.1 not identified in table;	Alignment sheets have been updated.	Vol II, App F	Volume II

Comment ID	Comment	Response	Report Section	Page No.
	iii. Driveways crossed at MP 14.0,18.7, 21.2, 37.9 are not identified in the alignment sheets or table but are visible in imagery; iv. "Existing Road" crossed at MP 20.1 not identified in table; v. "Driveway" crossed at MP 33.8 not identified in the alignment sheet; vi. "Mud Pond Road" crossing at MP 41.31 not identified in the alignment sheet; g. Segment G: i. Driveway crossed at MP 8.5 is visible on imagery but identified in table or in the alignment sheets; ii. "Plains RD" crossing at MP 13.47 not identified in the alignment sheets; h. Segment I: i. "Stone Mountain Road" and "Attleboro Road" feature not clearly visible in the alignment sheets; ii. "Unknown Road" crossings at MP 13.5 and 19.2 not identified in table; i. Segment J: i. Due to error in the table, the crossings listed for MP 1.99, 2.06 and 2.2 need to be removed; ii. Crossing at MP 1.63 needs to be attributed to "NH-124"; iii. "Unknown Road" crossings at MP 14.8 and 16.5 are not identified in table; iv. "Thoreau LN" crossing at MP 18.32 not shown in the alignment sheets; v. Remove "Unknown Road Crossings" at MP 19.00 and 18.94; vi. Add "Hertzgar DR" crossing at MP 18.95; vii. "Existing Road" crossing at MP 22.5 not shown in table; viii. Driveways need to be identified throughout; ix. "Greens Pond Drive" crossing at MP 24.71 not identified in the alignment sheets; x. "Unknown Road" crossing at MP 35.6 not identified in table; j. Segment N: i. "Snowberry Road" crossing at MP 0.19 needs better identification of the feature	The data set for roadways has been changed to Tiger data from the U.S. Census data. RR tables and alignment sheets are updated accordingly. Driveway impacts will be negotiated with landowners and will be covered in the line list. Driveways that are contained within the Tiger data set or field surveyed will be the only ones depicted on the alignments.	Vol II, App F	Volume II
	ii. "Cecilia Cr" crossing at MP 1.83 not identified in the alignment sheets; k. Segment P: i. Sheets in provided PDF are out of order; l. Segment Q: i. Driveway crossing at MP 10.90 not identified in the alignment sheets or in table, but clearly visible in imagery; m. Segment R: i. "West Berlin RD" crossing at MP 1.15 not identified in table; ii. Driveway crossings at MP 1.15 and 1.16 not identified in the alignment sheets; and iii. "Existing Road" crossing at MP 11.8 not identified in table.	The data set for roadways has been changed to Tiger data from the U.S. Census data. RR tables and alignment sheets are updated accordingly. Driveway impacts will be negotiated with landowners and will be covered in the line list. Driveways that are contained within the Tiger data set or field surveyed will be the only ones depicted on the alignments.	Vol II, App F	Volume II

TBP - To be provided

Attachment 1

Responses to February 27, 2015 Comments on Resource Reports 1 and 10

Comment ID	Comment	Response	Report Section	Page No.
General Comment				
1	For information noted as being filed at a later date or upon completion, provide an estimated date for submittal. Draft copies of all noted mitigation plans should be included in the Application when filed.	Comment acknowledged.	N/A	N/A
2	Upon provision of the Environmental Construction Plans (ECPs), provide a summary table of how each State ECP differs from one another, and from the FERC Upland Erosion Control, Revegetation, and Maintenance Plan (Plan) and Wetland and Waterbody Construction and Mitigation Procedures (Procedures).	Comment will be addressed in the Final ER.	TBP in Final ER	N/A
3	Identify if odorization facilities would be constructed in conjunction with the Project facilities. If so, identify the locations where odorization equipment would be located and discuss any mitigation to reduce odors.	The design of such facilities will also incorporate safety and operational features that will significantly reduce the odor from the mercaptan during the operation of the facility. The majority of the odorant facility will be enclosed in a secure building with air filtration. The mercaptan will be stored in a double walled storage tank with welded connection above the liquid line to minimize sources of leakage. The odorization system is a closed circuit system. Infrequent and planned exposure to the atmosphere will be conducted only under the supervision of Tennessee personnel and limited to filling of mercaptan tanks and release of odorized gas during blowdown events. During these procedures, masking agents may be utilized to reduce the odor or flaring may be applied to eliminate the vapors during an intentional release.	11.2.2	11-6 to 11-7
4	Identify any additional delivery points and provide information on any associated metering and regulation facilities.	Comment will be addressed in the Final ER submitted.	TBP in Final ER	N/A
Draft Resource Report 1				
1	File alignment sheets as "privileged" that include landowner names above each parcel, or file a public version of the alignment sheets with tract numbers and provide a separate list of tract numbers with the landowner of the tract as "privileged".	Addressed in the 3/13 Draft ER 1 filing.		
2	Update Table 1.0-1 and the associated text to reflect each facility by specific mileposts including compressor stations. Include the specific compressor station mileposts in Table 1.1-3. Milepost numbers should include an indicator identifying the pipeline segment (example MP SP1.0 = milepost Supply Path 1.0, etc.)	Tables 1.0-1 and 1.1-3 have been updated to include the mileposts and associated pipeline segments for each facility.	Table 1.0-1 Table 1.1-3	1-4 to 1-9 1-32 to 1-34
3	For each planned compressor station, provide a large scale (1:3,600 or greater) plot plan identifying the proposed engine/compressor units, buildings, piping and other equipment, site property line, and nearby noise-sensitive areas (such as residences, farms, or schools).	Draft compressor station plot plans are provided in Volume IV, Appendix AAA.	Vol IV, App AAA	Volume IV

Comment ID	Comment	Response	Report Section	Page No.
4	In Section 1.1.2.1, clarify why certain pipelines or laterals have a maximum allowable operation pressure (MAOP) equal to the maximum operating pressure (MOP), and others are designed to have a MOP of approximately half of the MAOP.	The Project is installing a new 30-inch pipeline which has a MAOP of 1,460 psig, while much of Tennessee's legacy system is in the 700 to 800 psig range. The pipelines facilities with a MAOP in excess of the MOP are physically connected to both the new 1,460 psig pipe and the lower MAOP legacy system. At the current design quantities it is better hydraulically to operate those lines in common with the lower pressure legacy system so that some of the volumes from the old system flow on the new pipe, resulting in less friction and pressure loss. As a secondary benefit, even if the new pipes are never changed to the higher MOP, the new pipelines with the MAOP in excess of their MOP will be able to adjust to changes in class location without requiring replacement pipe to be installed. The MAOP would be lowered from 1,460 psig to a lesser number, but still in excess of the MOP in the 700 to 800 psig range. Once again Tennessee will be able to make adjustments without the environmental and landowner impact normally associated with pipeline replacements due to class location change.	11.2.1	11-6
5	In Table 1.1-2, specify the distance between the existing and proposed permanent rights-of-way and indicate the potential for further overlap that would allow abutting of the permanent rights-of-way in the associated text. In addition, specify the maximum overlap of existing rights-of-way allowable by the law, as stated throughout Resource Report 1.	Existing ROW widths anticipated to be used during construction of the project facilities has been included. However, these widths may vary as Tennessee obtains additional information regarding the use of existing ROWs. Updated information will be provided in the Final ER, as necessary.	Table 1.1-2 TBP in Final ER	1-25 to 1-29
6	In Section 1.1.2.1.3, expand the text in the bullets to clarify what other states the laterals would extend into if they would not be wholly located in Massachusetts.	Addressed in the 3/13 Draft ER 1 filing.		
7	In Section 1.1.2.4.2, clarify in the bullet list that the Granite/Pleasant St. and Cranston-Providence meter stations are existing meter stations that would be modified to increase flow.	Addressed in the 3/13 Draft ER 1 filing.		
8	In Section 1.2.3, provide a table listing the new and modified access roads that are proposed for use, including the location by milepost, the size, and the type of modification required on existing roads. If this information is not available, identify when it will be provided. Indicate whether Tennessee would use temporary or permanent access roads proposed for the Constitution Pipeline Project where it is co-located.	A table listing all access roads that have been identified to date, including those to be used for the Constitution Pipeline Project (where co-location is proposed), is provided in Resource Report 8. Tennessee is continuing to identify additional access roads and the need for permanent access roads on other portions of the Project and will provide updated information in the final ER.	Attachment 8b	8b-159 to 8b-171
9	Update Table 1.2-6 to indicate the percentage of landowners where access has not been requested and add a footnote indicating how many landowners granted, then rescinded, survey permission, as well as how rescinded landowner permissions were accounted for in the table.	Survey permission was requested from landowners within a 400 foot corridor on the proposed pipelines. The total landowners denying access permission and the percentage of no access status of landowner permissions obtained to date is provided in Table 1.2-5.	Table 1.2-6	1-63
10	In Section 1.3.1.4, discuss when the results of any scour analysis will be incorporated in to the Resource Reports and provide a cross-reference to where a detailed discussion is provided.	The results of any scour analysis will be provided in the Final ER.	TBP in Final ER	N/A

Comment ID	Comment	Response	Report Section	Page No.
11	Regarding the construction procedures listed in Section 1.3.2: a. discuss the procedures and depth of burial for crossing railroads, foreign pipelines, and utilities; and b. provide a table listing all known foreign pipelines, utilities, railroads, and roads that would be crossed, by milepost.	**a.** The majority of road crossings will be completed using standard open cut or conventional boring methods. Conventional boring entails drilling a hole beneath travel arteries through which the pipe will pass. Additionally, any railroad alignments without rails in which the easement is no longer valid will be open cut. Resource Report 8 of this ER provides additional information regarding the crossing of roadways and railroads associated with the Project. **b.** A table listing all known roads and railroads has been provided in Resource Report 8. Existing pipelines and utilities are provided on the alignment sheets.	**a.** 1.3.2.4 8.1.6.1.6 **b.** Table 8.1-10 Table 8.1-12 Vol II, App F	a. 1-85 to 1-86 8-27 to 8-31 b. 8b-184 to 8b-221 8-30 to 8-31
12	In Section 1.3.2.2, include a cross-reference as to the section of the Resource Reports that fully describe the criteria for whether groundwater wells and springs within 200 feet of the construction right-of-way will be tested, the testing procedures for water quality and quantity, the timeframe for testing, and measures that would be implemented in the event that water testing indicates an impact on a well.	Tennessee has agreed to perform pre- and post-construction monitoring for well yield and water quality for private wells within 200 feet of the proposed construction workspace. Should the integrity of any water supply well be impacted during construction, either water quantity or quality, Tennessee would provide an alternative water source or compensate the landowner for a new, comparable well.	2.1.6	2-27 to 2-28
13	In Section 1.3.2.2.2, discuss the circumstances under which the stove-pipe construction method would be used instead of the drag-section construction method.	Addressed in the 3/13 Draft ER 1 filing.		
14	Include discussion and consideration of direct pipe trenchless pipeline installation technology in section 1.3.2.5.	A discussion of the Direct Pipe® trenchless construction method is discussed in the ECPs and has been added to RR1.	Vol II, App J-N 1.3.2.5.3	1-89
15	In Section 1.3.2.9, ensure that the forthcoming table listing and justifying deviations from the FERC Plan and Procedures, if applicable, include the section of the Plan or Procedures for the requested deviation, the deviation itself, justification for the deviation, and how the deviation would provide equal or greater mitigation. If major modifications to the FERC Plan and Procedures are proposed, Tennessee should provide its own modified versions of the documents that would be used during construction and operation of the Project.	Proposed modifications to the Commission's Plan and Procedures identified as of the date of this resource report are included in Volume II, Appendix H. These modifications, if approved by the Commission, will be incorporated in the Project-specific ECPs for each state. Tennessee will determine if anticipates that it will request any additional modifications to the Commission's Plan and Procedures as it Tennessee continues to develop its Project route; any additional modifications will be requested in the final ER.	Vol II, App H	N/A
16	In Section 1.3.3.3, update the text to include New Hampshire in the list of states where air quality impact modeling will be conducted, and associated applications will be filed.	Text has been updated.	1.3.3.3	1-93

Comment ID	Comment	Response	Report Section	Page No.
17	In Section 1.3.4: a. provide the expected construction start date for each segment of pipeline, pipeline lateral, and compressor station, when known; b. discuss the number of spreads and workers per spread required for the proposed laterals;	a. Certain aspects of construction, including winter tree clearing to avoid Indiana bat and other endangers species breeding periods, compliance with the Migratory Bird Treaty Act ("MBTA"), installation of HDD segments, and contractor yard preparation, are planned to begin in the first quarter of 2017. The 2017 construction activities for the mainline and facility scope of work are scheduled to commence in the spring of 2017, pending specific construction windows imposed on the Project. Winter tree clearing for the 2018 construction activities is scheduled to commence in October 2017, with the 2018 construction activities for the mainline scheduled to commence in the spring of 2018. It is anticipated that installation of the HDD segments and facility scope of work will continue year-round once started. All Project facilities are anticipated to be placed in-service by November 2018 (with the exception of two proposed pipeline looping segments in Connecticut which would be placed in service by November 1, 2019). The details regarding the anticipated 2017 and 2018 construction activities will be provided in a subsequent filing of the final ER. b. Tennessee estimates that seven construction spreads will be required for the pipeline construction portion of the Project. Each spread will consist of approximately 500-1,200 personnel depending upon the pipeline facility, and each spread will take approximately 9 months to 1 year to complete, depending upon site-specific conditions for each pipeline facility.	**a.** 1.3.4 TBP in Final ER **b.** 1.3.4	**a.** 1-94 to 1-95 **b.** 1-94 to 1-95
	c. clarify whether the construction workers and timeframes provided for compressor and meter stations are those required for each individual facility, or for each type of facility combined; d. provide the number of permanent staff anticipated during operation; and e. provide locations for the new operations offices or district offices that would be required for operation, or clarify that none would be needed.	**c.** Construction of the new and modified compressor station facilities will require approximately 9 months to 1 year to complete and will each require up to 45-75 construction workers, depending upon the facility. Construction of the new and modified meter station facilities will require approximately 2 months to 6 months to complete and will each require up to 20-40 construction workers, depending on the facility. **d.** Tennessee anticipates the need for approximately 26 additional full time employees for operation of the Project facilities. **e.** The required additional permanent staff will be stationed at existing Station 319 and new offices will be located at the new Project compressor stations. Two new district offices are planned for these new facilities. One of which will be located in Franklin County, New York at the Supply Path Mid Station. The other district office will be at Market Path Mid Station 4 in New Ipswich, New Hampshire.	**c.** 1.3.4 **d.** 1.3.4 **e.** 1.3.4	**c.** 1-94 to 1-95 **d.** 1-94 to 1-95 **e.** 1-94 to 1-95

Comment ID	Comment	Response	Report Section	Page No.
18	In Section 1.3.5, provide a more detailed discussion on the environmental training that would be conducted for construction personnel if the Project were approved. Specify which construction personnel would receive training, when and how often the training would occur, and what documents would be provided (e.g., the FERC Plan and Procedures, or the Tennessee Plan and Procedures, as appropriate). In addition, discuss measures to ensure contractor compliance with the required mitigation.	Tennessee will use a minimum of one qualified, full-time EI for each pipeline spread during Project construction, as well as a minimum of one Lead Environmental Inspector ("LEI") to oversee the EI staff. The EIs assigned to oversee construction for the individual pipeline spreads will also oversee the construction of the new and modified compressor stations, meter stations, and appurtenant facilities in the area. Tennessee conducts in-house EI training to ensure that the EIs will be able to carry out their duties as described in this document and that construction activities will be in compliance with the Project-specific ECP requirements for each state, and with requirements of applicable federal, state, and local environmental permits and approvals and environmental requirements in landowner easement agreements. Additionally, Tennessee will conduct environmental training in advance of construction, and the EIs will perform all duties as specified in Tennessee's Project-specific ECPs for each state. The level of training will be commensurate with the type of duties of the Project personnel.	Vol II, App J-N 1.3.5	1-95
19	In Section 1.4.1, clarify that the proposed annual vegetation maintenance in uplands would only occur over a 10-foot-wide corridor centered on the pipeline, and that edge-to-edge maintenance would only occur once every three years, as specified in the FERC Plan.	Addressed in the 3/13 Draft ER 1 filing.		
20	Update Table 1.6-1 to include all required permits/consultations for New Hampshire as no Section 106, state listed species, or air quality permits/consultations are listed.	Addressed in the 3/13 Draft ER 1 filing.		
21	In Section 1.7, specify whether power, water, or other utility lines would be constructed for the proposed aboveground facilities.	Non-jurisdictional facilities associated with compressor stations and meter stations have been provided in this ER. Additional information, as applicable, will be provided in the Final ER.	1.7	1-128 to 1-131
22	Include contact information in the Stakeholder List for the libraries and newspapers identified in Tables 1.8-1 and 1.8-2.	Contact information for the libraries and newspapers has been included in the landowner list in Volume III.	Vol III, App AA	Volume III
23	Consult with land managing agencies, state and local planning agencies, and other appropriate entities to identify past, present, and reasonably foreseeable future projects (e.g., roads, bridges, mining, utility projects, other pipelines and compressor stations, large commercial/industrial/residential developments, etc.) in the potential resource area of impact that could be affected by the Project. Tennessee should describe how it defines the area of impact for each resource, and include a table that identifies: a. the project(s) type/name and county; b. approximate distance and direction of the project(s) from the proposed Project facilities; c. a description of the project(s); and d. the current status and schedule of the project(s) (e.g., proposed for October 2015, under construction, completed). Include a description of cumulative and/or overlapping impacts these projects and the planned Project would have on each environmental resource. Also include descriptions of the measures that would be implemented to minimize these impacts. Lastly, include a map showing the identified projects in relation to the planned Project.	A list of projects potentially contributing to cumulative impacts is listed in Table 1.9-2, Appendix 1b. Attachment 1c includes a preliminary list of sources used to locate existing or proposed minor and major projects which may be utilized for the resource-specific cumulative impacts analyses. For projects potentially contributing to cumulative impacts, data collection, location mapping, and assignment of impact magnitude per project has been included in each resource report.	1.9 Attachment 1b, Table 1.9-2 Attachment 1c	1-141 to 1-159 1b-1 to 1b-47 1c-1 to 1c-3

Comment ID	Comment	Response	Report Section	Page No.
Draft Resource Report 10				
1	Update Resource Report 10 to: a. clarify which alternatives and deviations are still being considered and which have been incorporated into the proposed route; b. provide representative figures and tables detailing the locations of incorporated alternatives and deviations, as well as comparisons of impacts for relevant resources and the ultimate reason for its incorporation; c. include at least one alternative for each segment of the proposed Project, including the laterals; d. specify and evaluate any reasonable route alternatives that were suggested by the public or agencies, as well as the feasibility of those alternatives. List and describe the rationale for any alternatives that were determined to be unreasonable and dismissed without evaluation; and e. specify and evaluate system alternatives that were suggested by the public or agencies, as well as the feasibility of those alternatives. Include pipeline system alternatives, conservation alternatives, as well as renewable energy alternatives. List and describe the rationale for any alternatives that were determined to be unreasonable and dismissed without evaluation.	Additional information regarding alternatives identified as part of the pre-filing process have been developed and included in this filing. This includes landowner and agency requested route deviations. As additional alternatives are developed, they will be included in the Final ER.	Resource Report 10 10.3.3	Resource Report 10 10-66 to 10-74
2	Provide a table of the proposed and/or estimated capacities of the pipeline systems reviewed in Section 10.2.2, based on the sources reviewed by Tennessee. In addition, provide a tabular comparative analysis of system alternatives as presented in table 10.2-1 of the FERC's Guidance Manual for Environmental Report Preparation. Depict on maps the locations of the all potential system alternatives, including Portland Natural Gas Transmission System and Granite State Gas Transmission, which appear to be missing from the mapping provided. Consider whether pipeline segments or facilities from different system alternatives could be combined into a hybrid system alternative.	Proposed capacities of alternate systems are provided in Table 10.2-1. Locations of existing systems are provided in Figures 10.2-1 to 10.2-6 in Attachment 10a.	10.2.2 Attachment 10a	10-17 Attachment 10a
3	Existing and proposed pipelines, such as the proposed Constitution Pipeline, may be routed along ridge lines in steep terrain. Evaluate the constructability of the proposed NED route where it would be collocated with existing pipelines in steep terrain and where the most suitable location for construction may already be encumbered. Further, identify and describe any other potential constraints associated with collocation with other pipelines or electrical transmission lines including side slopes, urbanized areas, or other factors.	In areas along the ROW where steep side slopes are encountered, the two-tone cut and fill construction methods will be utilized for equipment and/or personnel safety considerations. ATWS will be needed at these locations to accommodate excavated material from the temporary cut and fill areas, while allowing for the temporary storage of trench spoil, excess rock material, cut timber, and, in some cases, salvageable topsoil.	1.3.2.1	1-83
4	Evaluate whether the lift and lay construction method could be used at any looped pipeline segments operated by Kinder Morgan, and along any existing pipeline segment besides the Haverhill Lateral.	Tennessee also considered whether the take-up and relay construction technique whereby an existing Tennessee pipe would be replaced with a much larger pipe should be utilized. There are several drawbacks to utilizing the take-up and relay construction method; therefore, Tennessee has chosen to apply the take-up and relay methodology only for the Haverhill lateral. Tennessee is also using directional drills and stove pipe construction for other portions of the project as warranted by the particular circumstances.	10.3	

Comment ID	Comment	Response	Report Section	Page No.
5	Include data categories in all alternatives comparison tables for miles or feet of expected side-slope construction (including data for both moderate and severe side slope), shallow bedrock, karst geology, landslides, numbers of landowners affected, residences located within 125 and 250 feet of a proposed work area, and miles or acres of interior forest.	Details regarding geological resources is included in Resource Report 6.	Resource Report 6	Resource Report 6
6	Where the proposed route deviates significantly away (at least 0.5 mile) from the original Northeast Exchange Alternative for a substantial length (at least 1 mile), provide an analysis and comparison of the two routes with particular emphasis regarding the avoidance of potential constraints associated with collocation with the Constitution Pipeline.	The NEEX Alternative was originally proposed by Tennessee as a competing pipeline to the recently approved Constitution Pipeline Project route, extending from Tennessee's existing Station 321 in Pennsylvania and traveling north and east to Wright, New York (Figure 10.3-3). The Commission's analysis of the Constitution route deemed that its proposed alignment is the most viable route in this area. In fact, Constitution adopted a majority of the NEEX route originally developed by Tennessee. With this analysis and Constitution's receipt of their certificate from the Commission, Tennessee does not consider the NEEX route to be an environmentally sensitive alternative as the NEEX route contains numerous deviations from the certificated Constitution route. As a result, the proposed Pennsylvania to Wright Pipeline Segment has been generally co-located with the approved Constitution Pipeline Project alignment, except as discussed above in Section 10.3.1.1.1.	10.3.1.1.4	10-28
7	For each major alternative in Section 10.3.1, clarify whether modification, addition, or removal of laterals along the proposed route would be required.	Additional information has been added regarding modification, addition, or removal of laterals that would be required for major route alternatives.	10.3	10-18 to 10-52
8	Regarding the Constitution Route 1 Alternative: a. specify whether any laterals or aboveground facilities would be required along this alternative at the interconnection with the potential shipper identified in Section 10.3.1.1.1; b. identify the location of the potential project shipper connection with Route Alternative 1 in Figure 10.3-1; and c. clarify the discrepancy in the total length of co-located pipeline in Section 10.3.1.1.1 and Table 10.3-1.	Information regarding the Constitution Route 1 Alternative has been included in Section 10.3.1.1.1.	10.3.1.1.1	10-20
9	Provide comparison tables for the Article 97 Avoidance and Co-location Route Alternatives and list and describe the subject properties in Resource Report 10, as and depict them in mapping as well.	Article 97 Avoidance and Co-location Alternatives are depicted on Figure 10.3-12.	Attachment 10a	Attachment 10a
10	In Section 10.3.3.2, provide documentation of consultation with Massachusetts agencies to identify and evaluate agency requested minor route deviations and provide alternatives comparison tables. List and describe the Areas of Critical Environmental Concern in Resource Report 10, as and depict them in mapping as well.	Agency-requested route alternatives have been updated. As additional route alternatives are requested, they will be analyzed and provided in the Final ER.	10.3.3.2	10-66 to 10-74
11	Provide a table similar to table 10.3-10 containing all of the landowner-requested and agency-requested minor route deviations and include an additional data column indicating whether the stakeholder's concerns have been resolved. Provide updates of this table as appropriate throughout the course of the project.	Tables 10.3-14 and 10.3-15 include landowner and agency-requested route deviations evaluated and resolved as of the date of the filing of this ER. These tables will be updated in the Final ER.	10.3.3.2	10-67 to 10-74

Comment ID	Comment	Response	Report Section	Page No.
12	Once alternative compressor station locations are available, provide in Section 10.4: a. details on the sizing, locations, limitations, and environmental impacts (including noise and visual impacts) of each alternative; b. an assessment of technology alternatives for compression equipment, providing sufficient data to identify the alternative(s) with the lowest emissions; and c. a specific examination of the feasibility of installing waste heat recovery systems at proposed new and modified compressor units.	Alternative sites for compressor stations have been added.	10.5	10-76 to 10-82
13	Provide an alternatives analysis for all of the compressor stations and for all other permanent, above-ground facilities such as meter stations and mainline valves where appropriate, such as where there could be visual or noise impacts to sensitive receptors.	Comment will be addressed in the Final ER.	TBP in Final ER	N/A
14	Provide a discussion of the feasibility of using electric-motor-driven compressors at the proposed compressor stations. Provide the rate of electricity required and the number of electric motors required. Compare the size of the electric transmission line necessary under the current proposal with what would be required for the electric motors.	Comment will be addressed in the Final ER.	TBP in Final ER	N/A
15	Provide a discussion regarding the feasibility of using waste heat electric generation (cogeneration) for the proposed turbines at the proposed compressor stations. Provide the rate of electricity potentially generated on a kilowatt/month basis and compare this with the amount of electricity used by the compressor station(s) per month. Describe the average load factor of the facility and any impediments that would prevent the operation of the compressor station continuously at 60% minimum load. Compare the size of the electric transmission line necessary under the current proposal with what would be required under a cogeneration system with return to the electric grid.	Comment will be addressed in the Final ER.	TBP in Final ER	N/A

Attachment 2

Responses to U.S. EPA Comments on Resource Reports, May 15, 2015

Comment ID	Comment	Response	Report Section	Page No.
General Comments				
1	**Co-location** The resource reports explain that a significant portion of the proposed NED pipeline will be co-located with other utility rights of way as a means to reduce Project impacts. This approach has merit and should be fully considered. Additional information should be provided in the resource reports in both plan view and tabular format to clearly depict the overall (net) change in ROW width along the proposed Project segments to be co-located. Plan views, with sections along the entire corridor would improve understanding of potential impacts (and impact avoidance) including tree clearing/forest fragmentation, and impacts to wetlands, etc. The discussion in Resource Report 10 (page 10-15) notes that the new pipeline would be placed 5' outside of existing utility easements to reduce impacts. Is this the case for all co-located segments? We request that the Resource Reports (and ultimately the EIS) provide information for the entire Project area to explain the width of the existing ROW, how much of the ROW is currently cleared, and how much more the ROW will be expanded/widened (cleared) as a result of the proposed co-location (Table 1.1-2). Again, section views in representative co-located sections will be helpful in this regard. The discussion of co-location at 10-15 and elsewhere begs the question whether co-location at any point along the proposed pipeline alignment will lead to a violation of commitments made or the spirit of previously approved pipelines. For example, if previous approvals included limits on the right of way width to avoid fragmentation/habitat impacts these approvals should be discussed in the co-location discussion.	Co-located pipelines are those that are laid parallel to another existing pipeline, but are not connected in any way. The current route of Tennessee's proposed NED Project, in part, is located parallel and adjacent to, and, in some cases, overlaps existing utility easements (either pipeline or electric utility). This paralleling/overlapping of easements is commonly referred to as co-location. For areas of the NED Project pipeline alignment that are proposed to be co-located with existing power line easements, Tennessee is proposing that the centerline of the pipeline will be installed generally five (5) outside the existing power line easement boundary. The proposed alignment is reflected in the proposed impacts of the Project discussed in the ER and in the attached power line co-location configurations, ROW-Config_05 and 06, included in Volume II, Appendix G. Tennessee is proposing that the temporary construction workspace for the Project for these areas of co-location would overlap the existing power line easement between 30 to 60 feet. The amount of overlap of temporary construction easements and the existing power line easements will depend ultimately on the location of the closest power line towers, which will dictate the amount of available space on the power line easement. For all areas of co-location with power line easements, Tennessee is proposing that 20 feet of the 50 foot permanent easement overlap the existing power line easement. Tennessee's proposed overlap of temporary construction workspace and permanent easement with existing power line easements will reduce environmental and landowner impacts a commensurate width outside the power line easement. Tennessee has engaged in discussions with the power companies regarding co-location and the proposed overlapping of NED Project temporary and permanent easements with that of existing power line easements and these discussions are ongoing. Tennessee may adjust the proposed centerline location of the pipeline and overlapping areas in the final ER for the Project to reflect these discussions, including appropriate mitigation for safety and operational considerations, as well as landowner and agency concerns, avoidance of sensitive environmental resources, and construction considerations.	1.0	1-2
2	**Compressor Stations** Resource Reports 1 and 10 note that final locations for compressor stations have not been determined. This makes it difficult to offer comments. We note that this is a big data gap in an area of great public interest. When this information is developed it should be accompanied by a thorough evaluation including distances to abutters and sensitive receptors as well as potential impacts, including air, noise and lighting impacts, and mitigation measures to address those impacts. The analysis also notes that compressor stations require 10 acres of land for operation. It would be helpful if the report included the basis for that assumption and a discussion whether impacts from compressor station operation could be further minimized with additional land. A similar question applies to metering stations and how the suggested area standards were developed.	Compressor station locations were filed with the Commission on June 1, 2015 and are included in this ER. A thorough evaluation of the distance to abutters and sensitive receptors, as well as potential impacts including air, noise, and lighting will be provided in the Final ER. Acreages for compressor and meter stations are based on Tennessee's experience building/operating existing stations.	1.1.2.2.1 8.1.2 8.4.2.1 TBP in Final ER 1.1.2.2.1	1-32 to 1-34 8-114 to 8-116 N/A 1-30

Comment ID	Comment	Response	Report Section	Page No.
3	**Safety Monitoring** Resource Report 1 (at 1-122) describes remote safety monitoring of the pipeline through Tennessee information and software networks. The resource report should describe whether Tennessee could crosslink their safety network with applicable emergency responders in the host communities to improve response times in emergency situations.	Tennessee Gas Control monitors the pipeline system 24 hours a day, 365 days a year from the Gas Control Center using a SCADA system. If the control center observes an abnormal situation, local company personnel responsible for operating the pipeline in that area are contacted immediately. Gas Control can also isolate and shut down certain pipeline segments remotely, as necessary. The local company personnel in the community assess the situation, contact the appropriate emergency responders, and assist with incident response as needed or required. Local company personnel also monitor the pipeline(s) in their respective areas, both via the same SCADA system and visually, on a daily basis to ensure safe operation of the facilities. Tennessee works closely with emergency responders to ensure coordinated and effective responses to any potential emergency.	11.2.5	11-7 to 11-9
4	**Lack of Property Access for Survey Purposes** The percentage of "no access" reported in the Resource Report 1 (at 1-51) is meaningful and presents barriers to the accurate characterization of potential environmental impacts. Waiting to collect relevant Project information until after the close of the NEPA process (after the FERC certificate is issued) is one potential strategy but is far from ideal. EPA is concerned about the amount of desktop analysis that will be used and whether it will allow for impact characterization that accurately informs future permit reviews. Moreover, the lack of specific Project information for the pipeline alignment is compounded along the co-located segment adjacent to the proposed Constitution Pipeline where property access constraints have already limited on-the-ground surveys. Ideally, specific Project related information will be developed for this co-located portion of the alignment and presented in the resource reports and EIS for the Project.	Tennessee has flown the entire Project route to obtain high-resolution imagery and proposes to use this imagery to photo interpret the approximate boundaries for wetland and waterbody boundaries, ecological communities, and rare species habitat for areas with no access. Photointerpretation will provide a more accurate assessment of impacts as compared to publicly available data, however Tennessee recognizes that all boundaries will require field verification prior to construction.	1.2.6 1.2.7	1-63 to 1-75
5	**Alternatives Discussion** The narrative discussion of system alternatives in 10.2 and other systems in 10.2.2 would benefit from incorporation of an overall plan showing the locations of all existing pipeline infrastructure owned by Tennessee and other companies, existing capacities, and the degree to which those pipelines are at capacity. This information would help describe whether upgrades/expansions of existing systems owned by the Project proponent and others could meet the Project purpose.	The capacity of other systems is provided to the extent that the information is publicly available.	10.2.2	10-12 to 10-18

Comment ID	Comment	Response	Report Section	Page No.
6	**Constitution Pipeline** Resource Report 10 (at 10-11) discusses the Constitution Pipeline and notes that the Constitution FEIS "…acknowledges that construction of one larger pipeline rather than two smaller pipelines [if Constitution and NED were to share a pipeline] will generally reduce long-term environmental impacts…" It also indicates, "Commission staff states that were it to recommend that Constitution construct a larger diameter pipeline, that recommendation will directly conflict with the Commission's established policy on overbuilding." We question whether this conclusion is as definitive as the discussion suggests based on the market need information presented to support both projects. That same information describes a market where the need for additional capacity is great. The potential impact reduction benefits of a shared pipeline should not be so readily discounted, even if the coordination between two project applicants is difficult or complicated. We believe delays to the Constitution Project due to lawsuits and survey access speak to keeping the dialogue about a combined pipeline alignment (through what is now the proposed co-located Constitution/NED corridor) alive during the analysis of the NED Project.	Although the Constitution Pipeline Project Final Environmental Impact Statement ("FEIS"), in the Alternatives Section discussing Tennessee's NED Project, did acknowledge the possibility of requiring Constitution and Tennessee to build one larger diameter pipeline to accommodate the objectives of both the Constitution Pipeline Project and Tennessee's NED Project, the FEIS included further discussion (that is not cited in the comment) that if a larger pipeline was constructed, that extra capacity would not be immediately utilized, as sufficient takeaway capacity from Wright, New York, does not exist currently (e.g., the proposed Wright to Dracut Pipeline Segment of the NED Project). Also, as discussed in the FEIS, this capacity would not be available to be used until Tennessee files the certificate application for the NED Project, the NED Project undergoes NEPA review, is approved, receives all other necessary federal approvals, and is then constructed. After a discussion of the Commission's Certificate Policy Statement, under which the Commission applies a balancing test in reviewing proposals that weighs the environmental impacts of a project against purported benefits, the FEIS concluded that a recommendation that Constitution construct a larger diameter pipeline would directly conflict with the Commission's established policy on overbuilding. The Commission issued the certificate order for the Constitution Pipeline Project on December 2, 2014, adopting the FEIS findings and recommendations and Tennessee has developed the routing for the NED Project to generally co-locate with the certificated route of the Constitution Pipeline Project from Susquehanna County, Pennsylvania to Wright, New York, as discussed in Resource Report 1 of the draft ER, in order to reduce environmental and landowner impacts. The Constitution Pipeline Project and the NED Project have been developed to meet different project objectives, and are supported by different shippers and different market-driven obligations that may not be met by a combined project, as acknowledged by the Commission in the Constitution FEIS.	10.2.2	10-13 to 10-14
7	**Water Supply Well Testing** Resource Report 1 (at 1-76) states that Tennessee may test water wells within 150 feet of the construction workspace, both before and after construction. As the use of the term "may" is ambiguous the report should be modified to explain the conditions under which Tennessee wouldn't test. We also believe the 150 foot criteria should be extended where there is reason to believe that work may affect a larger area (e.g. where a drinking water well is downgradient of a work area).	Tennessee has agreed to perform pre- and post-construction monitoring for well yield and water quality for private wells within 200 feet of the proposed construction workspace. In order for a landowner or resident to immediately qualify for post-construction testing, they must allow Tennessee access to property on which such water wells are located conduct a pre-construction test. Tennessee will conduct testing of all wells within the proposed constraints, both pre- and post-construction, unless otherwise prohibited by the resident or landowner. Should the integrity of any water supply well be impacted during construction, either water quantity or quality, Tennessee would provide an alternative water source or compensate the landowner for a new, comparable well.	2.1.6	2-27

Comment ID	Comment	Response	Report Section	Page No.
8	**Natural Gas Requirements in New England** The Competitive Energy Services February 2014 Report "Natural Gas Supply Assessing Natural Gas Supply Options for New England and their Impacts on Natural Gas and Electricity Prices" concluded that "2 bcf/d of additional pipeline capacity is required to eliminate the natural gas price differential between New England and pricing points to the region's west and south. The additional 1 bcf/d above that proposed in the Governors' Letter will provide the region's electricity consumers $600 million a year in reduced costs beyond the savings they will realize as a result of the 1 bcf/d incremental capacity proposed in the Governors' Letter. This represents a 1 to 3 year payback period on the incremental pipeline investment, depending on the sequencing of the pipeline expansions." ISO New England president and CEO Gordon van Welie told reporters in January 2015 that "New England needs an additional 1.1 to 1.6 billion cubic feet of additional daily pipeline capacity to fuel the region's current natural gas generators during periods of peak demand, which occur on about 40 cold winter days per year…". According to the FERC EIS for the Constitution Project–Constitution will yield approximately.65 bcf/day, Spectra AIM will transport approximately .34 bcf/day, and Spectra's Atlantic Bridge will transport approximately .22 bcf/ day. NED is proposed to provide 2.2 bcf/day. In addition, Access Northeast states it will "funnel" an additional 1 billion cubic feet/day. Based on this information we believe more information should be provided to explain expected requirements for natural gas in New England over the next few years. The resource reports should further explain whether a combination of other proposed and ongoing projects fulfill the same capacity need as NED.	The project is currently proposing to deliver 1.3 Bcf/d. Technical and feasible system alternatives were evaluated in the Project area (Figure 10.2-1) in terms of their ability to meet the Project objectives, which were defined by the incremental level of firm transportation services contracted for the market, as will be described in the certificate application anticipated to be submitted in the fourth quarter of 2015 and in Resource Report 1 of this filing. The facilities associated with the Project are necessary to provide the incremental firm transportation capacity to meet the growing energy needs in the Northeast U.S., specifically New England. The Project, upon completion, will provide up to 1.3 Bcf/d of additional natural gas transportation capacity to meet the growing energy needs of LDCs, gas-fired power generators, industrial plants, and other New England consumers. As will be discussed in the certificate application anticipated to be submitted in the fourth quarter of 2015 and in the Purpose and Need section of Resource Report 1, the new transportation capacity to be created by the Project will help alleviate the natural gas pipeline capacity constraint in the Northeast U.S. by increasing capacity in high-demand markets in New England. By constructing and placing the Project into service, additional natural gas quantities from prolific supply sources, such as the Marcellus production area can be readily delivered to meet the growing demand for natural gas service in the Northeast U.S. market area on both a seasonal and annual basis with detailed consideration given to providing such service economically, safely, and with minimal impact to affected landowners and the environment. With its existing system in place, Tennessee is able to facilitate construction, operation, and maintenance of the Project through construction of the Project facilities outlined in Resource Report 1 of this filing.	10.2	10-10 to 10-19
9	**Stormwater Management** Resource Report 1 (at 1-184) states that Tennessee will install silt fences and/or hay bales around disturbed areas, as appropriate to the land, soil and weather conditions, to minimize the potential for erosion and impacts to off-site wetlands and water bodies and that erosion and sediment controls will conform to Tennessee's Project-specific ECPs for each state. Tennessee should consider the use of more effective best management practices, particularly where run-off could affect sensitive or impaired water bodies and wetlands. Many new stormwater best management practices have been developed in recent years.	Tennessee will consider additional BMPs such as super silt fence in locations where necessary to protect features within the ROW or along the ROW. Furthermore, Tennessee will abide by state erosion and sedimentation guidelines during construction using the most stringent of the BMPs to protect sensitive features either along or within the ROW. Erosion and sediment controls will conform to Tennessee's Project-specific ECPs for each state (Volume II, Appendices J, K, L, M, N).	Vol II, App J through N	Volume II
10	**Environmental Justice Analysis** Resource Report 1 (at 1-143) refers to the socioeconomic analysis at the county level. We have found that environmental justice analysis is more meaningful and less likely to mask potential impacts when conducted at the municipal level, as EJ populations can vary dramatically at the county level. Evaluating EJ impacts at the municipal provides a more precise screen for EJ populations and the localized impacts they may suffer. EPA has a tool that evaluates EJ populations at the municipal level in New England. We are willing to assist with this evaluation as time and resources allow.	The socioeconomic analysis has been expanded for this filing; however, the analysis remains at the county level. The socioeconomic analysis will be prepared at the municipal level in the Final ER.	5.8	5-18 to 5-20
Specific Comments on Resource Reports				

Comment ID	Comment	Response	Report Section	Page No.
1	RR1, Page 1-11. First paragraph. Please discuss the "backhaul" on Tennessee's existing 200 line system, and how that increases capacity.	"Backhaul" refers to transporting gas in the opposite direction from historical operation. Tennessee generally flows from west to east in New England. Bringing gas into the eastern end of the existing system via NED will allow Tennessee to use the existing pipes to instead transport gas from east to west – first via displacement, and then if volumes become large enough via physical east to west flow.	1.1.1	1-12
2	RR1 – Table 1.0-1 – Is the designation "3" after the Loop number, a descriptor indicating the third loop of pipeline in that area? If so, describe when the previous loop was constructed, and discuss whether replacement of the original pipeline with a larger pipeline is less environmentally damaging, and would need fewer compressors than the Project proposal.	The designation "3" after the Loop ID number is a descriptor indicating that this is the third loop of the pipeline in the area. The original 300 Line system, which was constructed in the mid-1950s, consists of a 24-inch diameter pipeline that starts at the discharge of Compressor Station 219 in Mercer County, Pennsylvania, travels east through Pennsylvania, New Jersey, New York, and Connecticut, and ends at a 16-inch diameter pipeline at Compressor Station 261 in Hamden County, Massachusetts. Over a number of years, the 24-inch diameter pipeline was looped with 30-inch diameter pipeline loops as part of separate projects that had separate and distinct customer market and delivery needs and individual in-service target dates. The original 24-inch diameter pipeline and previous 30-inch diameter pipeline loops are may be referred to collectively in the ER as the "existing 300 Line" or the "300 Line," as opposed to the two proposed loops in Pennsylvania that are proposed as part of the NED Project (referred to as Loop 317-3 and Loop 319-3). At the locations where Tennessee proposes to construct the two new loops, the existing 300 Line is comprised of the original 24-inch diameter pipeline (referred to as the "300-1 Line") and a 30-inch diameter pipeline loop (referred to as the "300-2 Line").	1.1.2.1.1	1-21 to 1-22
3	RR1 – 1.1.2.3.2 – Compressor stations from the Constitution Pipeline should be listed as well.	The Constitution Pipeline project does not include the construction of compressor stations.	N/A	N/A
4	RR-1 Table 1.1-4 – Please explain why the Table shows more capacity associated with pipeline segments than the total Project.	Table 1.1-4 refers to meter stations, not pipeline segments. Volumes are not additive as check meter stations reflect flowthrough capacity only. New capacity does not equal contracted delivery.	N/A	N/A
5	RR-1 Table 1.2-1 This table should indicate area taken for NED, and the area taken for Constitution. This information will be helpful in the assessment of cumulative impacts, as well.	The impacts associated with the Constitution Pipeline are included in the Cumulative Impacts assessment in each RR.	1.9 2.4 3.5 4.6 5.10 6.7 7.6 8.6 9.2	1-141 to 1-149 2-100 to 2-160 3-109 to 3-117 4-68 to 4-70 5-29 to 5-35 6-77 to 6-79 7-18 to 7-20 8-117 to 8-150 9-82
6	RR 10.1.2.1. The report states that wind power is not an option for providing for existing or projected power needs in the Project area. The resource reports should describe any wind power projects in the Project area contributing to local energy demands. We also request that the contributions of the Anbaric Transmission's Vermont Green Line and Maine Green Line be incorporated into the discussion.	Tennessee has updated RR10 with wind energy projects publicly available as of November 2013. This is not intended to be a comprehensive list of the elective transmission proposals in the ISO-NE interconnection queue. Rather, they are intended to be representative of the types of transmission projects emerging inside and outside the region in response to the states' clean energy goals. Further, it is important to note that there is risk associated with the successful development of these projects and they are unlikely to be developed in sufficient quantity in the timeframe needed. Additionally, there is also the operational reality that renewable resources cannot be fully relied upon to produce the energy New England requires when demand is highest in the winter months. Finally, wind power cannot meet the specific purpose and need of the Project and provide the required natural gas pipeline transportation capacity provided by the Project.	10.1.2.1	10-4 to 10-6

Comment ID	Comment	Response	Report Section	Page No.
7	RR10.2.1. As discussed on the second FERC sponsored interagency "western" phone call, please provide a map, and table of all of the pipeline upgrade, loops, etc. to the Tennessee pipeline system in PA, NY, CT, MA, and NH and discuss if any of these upgrades are related to, or could replace the NED. This information request is also described in the alternatives section above.	Technical and feasible system alternatives were evaluated in the Project area (Figure 10.2-1) in terms of their ability to meet the Project objectives, which were defined by the incremental level of firm transportation services contracted for the market, as will be described in the certificate application anticipated to be submitted in the fourth quarter of 2015 and in Resource Report 1 of this filing. The facilities associated with the Project are necessary to provide the incremental firm transportation capacity to meet the growing energy needs in the Northeast U.S., specifically New England. The Project, upon completion, will provide up to 1.3 Bcf/d of additional natural gas transportation capacity to meet the growing energy needs of LDCs, gas-fired power generators, industrial plants, and other New England consumers. As will be discussed in the certificate application anticipated to be submitted in the fourth quarter of 2015 and in the Purpose and Need section of Resource Report 1, the new transportation capacity to be created by the Project will help alleviate the natural gas pipeline capacity constraint in the Northeast U.S. by increasing capacity in high-demand markets in New England. By constructing and placing the Project into service, additional natural gas quantities from prolific supply sources, such as the Marcellus production area can be readily delivered to meet the growing demand for natural gas service in the Northeast U.S. market area on both a seasonal and annual basis with detailed consideration given to providing such service economically, safely, and with minimal impact to affected landowners and the environment. With its existing system in place, Tennessee is able to facilitate construction, operation, and maintenance of the Project through construction of the Project facilities outlined in Resource Report 1 of this filing.	10.2	10-9 to 10-10
8	Table 10.3-4 – Provide Verification of impacts on Existing 200 line alternative. Tree and woodland losses should be included in all impact tables to reflect vegetation management that will be in effect for the life to the Project. Comparisons of habitat quality between impacts from the proposed alternative and the 200 line alternative should be made. The Table also uses the term "environmental hazards", and appears to use this as reason why the 200 line alternative may not be ideal. This term should be more fully explained as most of the environmental hazards appear to be gas stations and it is unclear how these present a danger to the pipeline. Also, disturbed land containing landfills and quarries along the route may represent an opportunity to avoid impacts thorough colocation.	Additional analysis of the Existing 200 Line will be provided in the Final ER.	TBP in Final ER	N/A
9	RR10.3.1.1.2. EPA continues to disagree that the I-88 Alternative received sufficient review and analysis in the previous review of the Constitution Project. This alternative, or any hybrid alternatives that can be collocated with I-88 should be analyzed to determine if it can be constructed or operated with fewer impacts than the proposed alternative.	Tennessee has had multiple meetings with the NYSDEC to discuss the routing and has agreed to evaluate this hybrid route, which will be discussed in the Final ER. However, it is Tennessee's intent to continue to follow the certificated Constitution Route as planned, and only adopt the hybrid route should significant minimization of impacts be realized and it is constructible.	10.3.1.1.3 TBP in Final ER	10-27

Comment ID	Comment	Response	Report Section	Page No.
10	RR10.3.1.1.3 The discussion in the resource report should be expanded to explain why the NEEX route is not viable even though it was used for the Constitution Project.	The NEEX Alternative was originally proposed by Tennessee as a competing pipeline to the recently approved Constitution Pipeline Project route, extending from Tennessee's existing Station 321 in Pennsylvania and traveling north and east to Wright, New York (Figure 10.3-3). The Commission's analysis of the Constitution route deemed that its proposed alignment is the most viable route in this area. In fact, Constitution adopted a majority of the NEEX route originally developed by Tennessee. With this analysis and Constitution's receipt of their certificate from the Commission, Tennessee does not consider the NEEX route to be an environmentally sensitive alternative as the NEEX route contains numerous deviations from the certificated Constitution route. As a result, the proposed Pennsylvania to Wright Pipeline Segment has been generally co-located with the approved Constitution Pipeline Project alignment, except as discussed above in Section 10.3.1.1.1.	10.3.1.1.4	10-28
11	RR10.3.1.2 We recommend that Table 10.3 include two other factors: wetlands being crossed by HDD or bored crossings (as compared to dry crossings) and interior forest impacts.	Additional information will be provided in the Final ER.	TBP in Final ER	N/A
Resource Report #1				
1	Page 1-27: The resource report should compare energy usage, emissions and noise between proposed compressor stations to the baseline condition (which would include any existing machinery or compressor/metering station emissions).	Air emissions and Noise Impacts are addressed in Resource Report 9.	Resource Report 9	Resource Report 9
2	Page 1-77: Historical and regular agricultural lands should be mapped. The analysis should discuss agricultural land affected during construction of the Project and long-term management of the Project.	Impacts to agricultural lands are provided in Resource Reports 7 and 8.	7.3 8.1.6.1.2	7-4 to 7-6 8-21 to 8-22
3	Page 1-121: The analysis should discuss the frequency of pipeline inspections and the environmental effects from related truck traffic/inspection equipment.	The pipeline and ROW will be patrolled on a periodic basis. The frequency of the patrol of the pipeline by either aerial or ground surveys is determined by the size, operating pressure, class, terrain, weather, and other relevant factors. Ground patrols will utilize the existing ROW for inspection of the pipeline. It is unlikely that any permanent impacts to the ROW will result in these patrols.	1.4.4	1-96
Resource Report #2				
4	Page 2-3: The analysis should explain why .25 miles was used in the search of the dataset report for groundwater hazards.	A 0.25 mile radius will sufficiently screen for groundwater hazards within the Project's vicinity.	2.1.1.1.4	2-3
5	Page 2-4: It would be helpful if a map was provided with section 2.1.1.2.1 showing all the aquifers along the Project route.	A figure has been provided that depicts the primary route in relation to the identified sole source aquifer.	Attachment 2a, Figure 2.1-2	Attachment 2a
6	Page 2-15: The analysis should discuss potential effects on wells on farms and other properties adjacent to the Project.	Tennessee is currently in the process of identifying and compiling information on the location of private drinking water wells and springs within 200 feet of any Project workspace area. As well information becomes available, the data will be updated and will be submitted in the Final ER.	TBP in Final ER	N/A
7	Page 2-30: "Unknown Crossings" in Table 2.2-2 should be more clearly defined.	Waterbodies labeled as "unknown" are the result of the waterbody type not being provided by the NHD data source.	Attachment 2b, Table 2.2-3	2b-12 to 2b-45
8	Page 2-79: More information about hydrostatic pressure testing should be provided.	Tennessee has identified potential sources of hydrostatic pressure test water for the Project, but has not yet determined the discharge locations. Tennessee anticipates filing applications with state agencies for hydrostatic testing water uptake and discharge, subsequent to submittal of the Final ER. Information regarding hydrostatic test water will be provide in the Final ER.	2.2.7	2-49

Comment ID	Comment	Response	Report Section	Page No.
9	Page 2-89: The timeline for pipeyards and access roads should be described in greater detail. The description should include potential affects from these storage yards, how long they will be used, and measures that will be taken to restore occupied areas once they are no longer needed.	Access roads and contractor yard boundaries will be designed to avoid wetland resources to the extent practicable. Therefore, minimal wetland impacts are expected from activities associated with the access roads and contractor yards. However, more specific information relative to wetland impacts will be submitted in the final ER.	2.3.5.3 2.3.5.4	2-96
10	Page 2-104: Table 2.3-1, Wetlands Associated with the Project in PA. Do the totals provided include pipeyards, access roads, and compressor stations even though these sites have not been determined? How were these acreages calculated?	The totals in Table 2.3-1 include pipeyards, access roads, and compressor stations identified to date that have been previously utilized on former Tennessee projects and those approved for use during construction of the Constitution Pipeline Project.	Attachment 2b	2b-45 to 2b-49

Attachment 3

Responses to U.S. Fish and Wildlife Service Comments on Resource Reports, May 15, 2015

Comment ID	Comment	Response	Report Section	Page No.
1	Section 3.1.1.2, New York Fisheries – Game and commercial species are listed but there are many other fish species not mentioned in this section which are vitally important for aquatic ecosystem health. Many species found in the Hudson River and its tributaries are not listed here but should be added. A more comprehensive list should be provided. This list can be obtained from the New York State Department of Environmental Conservation. They may also have GIS data that would help with the impact analysis. The NYSDEC Bureau of Fisheries produces annual reports which may also have relevant information.	According to the NYSDEC (2015c) there are 165 species of fish in New York's lakes, rivers, and streams; and Tennessee recognizes that each species plays a role in the ecological balance of the aquatic system. Table 3.1-2 lists common fish species potentially present within both warmwater and coldwater classified waterbodies crossed by the Project in New York. This is not intended to be a comprehensive species list, but an overview of more common and commercially important species that would be protected through implementation of BMPs and appropriate timing restrictions (e.g., avoidance of habitat during spawning periods).	3.1.1.2	3-5 to 3-6
2	Section 3.1.2, Fisheries of Special Concern – the document does not mention efforts by the FWS and our partners under the Eastern Brook Trout Joint Venture. This is a species of concern to us due to degradation and loss of habitat as well as declining populations (due to habitat impacts, climate change, and other factors). It is also a keystone species, representing other cold water biota. More information should be provided here on this species and the efforts to restore habitat. Just as important is an adequate analysis of the potential impacts from the proposed project on habitat (physical, chemical and abiotic attributes).	More information on restoration of stream habitats that will be implemented in all streams (including both warmwater and coldwater fisheries) has been provided.	3.1.4	3-17 to 3-18
3	Section 3.1.2.3, New York Programs – This section should be updated to indicate that the New York Field Office provided information to consultants for the project on federally-listed species.	The section has been updated with the information in the USFWS consultation letter received on April 6, 2015. Agency correspondence is included with this ER.	3.1.2.3 Vol II, App B	3-12 to 3-13
4	Section 3.1.3, Construction and Operation Impacts – General information is provided in this section and no substantial commitments are made to avoid impacts and minimize unavoidable loss. For example, it says fish migration may be temporarily blocked due to construction. A preferred approach would be to indicate that no work would take place during times when fish are migrating through a particular water body. The text also minimizes tree removal along the banks of streams to be crossed as minor and temporary. However, bank erosion can have long–term effects on stream stability and stream habitat. It would be preferably for the pipeline to be sited only in areas where there are openings adjacent to the stream and then be required to plant trees in work areas when finished. Special consideration should be given to the Hudson River crossing and should be discussed in the document.	Tennessee continues to evaluate waterbody crossing procedures including dry crossing, conventional bore, and HDD. In order to minimize impacts to local fish migrations, Tennessee will adhere to timing restrictions for sensitive fish species. In order to minimize impacts at all waterbody crossings, waterbody substrates, banks, and riparian zones will be restored immediately following completion of construction.	3.1.3 3.1.4 Table 3.1-6	3-15 to 3-19
5	Section 3.2.1, Existing Resources- Table 3.2-1 should be revised to indicate that the cerulean warbler is found in the New York section of the project and has been documented close to the project area. Page 3-35, the common name for Gyrinophilus porphyriticus should be northern spring salamander and not purple salamander.	Corrections have been made.	Attachment 3b 3.2.2.1.2	3b-1 to 3b-11 3-30

Comment ID	Comment	Response	Report Section	Page No.
6	The text indicates that the project will bisect a portion of the Cannonsville-Steam Mill Important Bird Area. Mapping provided by Tennessee indicates that a significant portion of the IBA will be bisected where the project does not collocate with the Constitution Pipeline in this area. Although the Constitution project will bisect a portion of the IBA, it appears that efforts were made to avoid a significant portion and instead will traverse mostly the perimeter. The NED project however would bisect substantially more IBA and presumably interior forest. This is of a concern to our agency. We request FERC require more justification for the current NED design and why it cannot collocate with the Constitution project to avoid the IBA. Consultations between Audubon and NYSDEC about this issue should include the FWS as well.	Information will be provided in the Final ER.	TBP in Final ER	N/A
7	Impacts to interior forest are of concern to the FWS for many species but particularly migratory birds. Even those areas of the NED project which will be collocated with other rights-of-way will cause loss of habitat and push the impacts deeper into interior forests in most cases. We recommend FERC require an analysis of this impact on interior forest habitat. A discussion between Tennessee and the FWS should address how this analysis would take place.	Tennessee recognizes the importance of large unfragmented forest blocks for the protection of interior forest breeding birds, wide-ranging mammals, and other wildlife. As described in Section 3.2.2.6, Tennessee is in the process of developing Project-specific land use-land cover data layers and mapping interior forest blocks. Tennessee anticipates using this information in conjunction with Audubon and NYSDEC consultations to assess impacts to forest interior habitats and develop mitigation measures necessary to protect interior forest breeding birds and other wildlife. Results of these consultations will be communicated in the final ER and in subsequent filings as needed.	TBP in Final ER	N/A
8	A footnote appears to be missing on Table 3.2-2. It should be noted that there be other sensitive wildlife habitats not listed on this table such as interior forests.	Added foot note: "Additional sensitive areas such as vernal pools, sensitive natural communities, and interior forest are described in other sections of this report"	Table 3.2-2	3-29
9	As currently written, the document provides very limited information on potential avoidance and minimization measures for impacts to wildlife and habitat. For example, there is no commitment to timing the project construction outside of the breeding season for migratory birds. Further, staging and other work areas should be sited in previously disturbed areas to the greatest extent practicable. Finally, there is no mention of mitigation for the loss of habitat. If construction timing cannot avoid the breeding season, pre-construction surveys for species of conservation concern may be requested near known locations in 2016.	Tennessee has attempted to avoid and minimize impacts to sensitive wildlife habitat by siting aboveground and appurtenant facilities within or adjacent to the permanent ROW and by selecting previously disturbed areas for use as ARs and contractor yards. Similarly, impacts are being avoided and minimized by selecting existing paved roads, farm roads, agricultural sites and other disturbed open lands, and developed areas, where possible, as temporary and permanent access roads for access to the construction workspace during construction and operation of the Project. Tennessee will adhere to avoidance and minimization recommendations developed through consultations. These will likely include pre-construction listed-species surveys, construction period oversight, timing restrictions on construction, and implementation of BMPs.	3.2.3.1 3.4.2	3-52 3-98 to 3-99
10	Section 3.4, Endangered and Threatened Species – The bog turtle and Northern long-eared bat should be noted for New York in Table 3.4-1. The status of the Northern long-eared bat on that table and Table 3.4-4 should be changed from Candidate to Threatened. Likewise, the text of the document should be updated to reflect the status change.	Table 3.4-1 has been revised and no longer includes state information. The status of the Northern long-eared bat has been revised to federally Threatened (T) throughout the document.	Table 3.4-1 3.4.2.1.2	3-84 to 3-85 3-100 to 3-101

Comment ID	Comment	Response	Report Section	Page No.
11	We have not yet received the survey results for the bald eagle surveys. Because this species has been expanding its range and breeding territories each year, the FWS may request a nest survey in the spring of 2016.	The aerial surveys were completed in April 2015. Results of the surveys will be provided under separate cover as Privileged and Confidential Information due to the confidential nature of the data (e.g., nest site locations) upon completion of the survey report.	3.4.2.1.7	3-102 to 3-103

Attachment 4

Responses to Letters in General Comments No. 3
May 15, 2015

Letter ID	Agency	Date	Summary	Response
A	Town of Northfield, Massachusetts	4/1/2015	Raise concerns about the scrutiny of environmental, health, and safety measures. They oppose the Massachusetts Environmental Notification Form process and request a full and formal environmental review and consideration of environmental permit requirements. They request additional information on the following: (1) duration of construction (2) construction noise and light (3) gas and VOC releases	Tennessee is preparing an Environmental Report (ER) to assess the potential environmental impacts and permitting requirements for the proposed Project. The ER is part of the application to FERC required under Section 7 of the Natural Gas Act and which will be reviewed by the Commission. The Commission will also prepare an Environmental Impact Statement for the project in compliance with the Council on Environmental Quality's Code of Federal Regulations (CRF), 40 CFR Parts 1500-1508, and the National Environmental Policy Act of 1969 (NEPA). The additional information requested has been addressed in the ER. Specifically, the information may be found as follows: (1) Construction will commence in the 1st quarter of 2017 and continue through 2018. Additional information regarding the construction schedule is provided in Section 1.3.4. A detailed construction schedule will be provided with the Final ER. (2) The noise impacts due to general construction equipment will be temporary. General construction equipment noise impacts will be mitigated as necessary through one or more of the following: • Maintaining equipment in accordance with good operating practices for noise control; • Selecting low-noise alternatives when possible (e.g., electric versus diesel engines); • Restricting the time of day or season of the year for construction; • Installing temporary noise barriers or constructing berms; • Enclosing equipment; and • Preparing site-specific noise management plans, including a communication mechanism for residents and businesses to report noise-related issues. (3) Detailed air emissions for the compressor stations are not yet available. They will be provided in the Final ER.

Letter ID	Agency	Date	Summary	Response
			(4) condensate liquids/PCBs (5) water body crossings (6) wetland construction mitigation (7) water runoff (8) impacts to ground water (9) spill prevention and control	(4) As documented in RR12, an analysis of PCB contamination is required for projects involving the replacement, abandonment by removal, or abandonment in place of pipeline facilities determined to have PCBs in excess of 50 ppm in pipeline liquids. The proposed Project does not involve, nor does Tennessee anticipate, the replacement or abandonment of any existing pipeline known or expected to have PCBs in excess of 50 ppm. (5) As reported in Resource Report 2, Tennessee proposes to use five construction methods to cross waterbodies: wet open cut, dry crossing, conventional bore, horizontal directional drill, or direct pipe method. Details regarding these construction methods are provided in Section 2.2.11. Specific construction methods for each waterbody crossing are provided in Tables 2.2-4, 2.2-5, 2.2-6, 2.2-7, and 2.2-8 in Attachment 2b of Resource Report 2. (6) Tennessee will protect and minimize potential adverse impacts on wetlands using construction procedures specified within Tennessee's Plan and Procedures (ER, Volume II, Appendix H) and the state-specific Environmental Construction Plans (ER, Volume II, Appendices J through N). (7) Water runoff, erosion, and sedimentation will be minimized through adherence to the measures in Tennessee's Plan and Procedures (ER, Volume II, Appendix H) and the state-specific Environmental Construction Plans (ER, Volume II, Appendices J through N). Additional information regarding erosion control and sedimentation procedures is provided in Section 7.5.1 of Resource Report 7. (8) Impacts to groundwater are described in Section 2.1.6 of Resource Report 2. (9) Tennessee will follow the measures detailed in Tennessee's Plan and Procedures (ER, Volume II, Appendix H) and Tennessee's Spill Prevention and Response Plan in the state-specific Environmental Construction Plans (ER, Volume II, Appendices J through N, Attachment 3J through 3N) for spill prevention and control.

Letter ID	Agency	Date	Summary	Response
			(10) construction staging areas (11) hazardous materials and the community right to know (12) odor	(10) Construction staging areas, or Contractor Yards, are identified in Table 8.1-7 in Attachment 8b of Resource Report 8. Locations of proposed Contractor Yards are depicted on the USGS topographic maps and aerial alignment sheets provided in Volume II, Appendix E and F, respectively, of the ER. (11) Tennessee is continuing to identify properties previously impacted with oil and/or hazardous materials within 0.25 mile of the proposed Project. A list of identified sites to date is provided in Table 8.3-8 of Resource Report 8. (12) Portions of the pipeline will be odorized with mercaptan according to state and/or local ordinances. This practice is utilized to enhance the safety of the general public during the unlikely event of an inadvertent release of natural gas. The design of such facilities will incorporate safety and operational features that will significantly reduce the odor from the mercaptan during the operation of the facility. The majority of the odorant facility will be enclosed in a secure building with air filtration. The mercaptan will be stored in a double walled storage tank with welded connections above the liquid line to minimize sources of leakage. The odorization system is a closed circuit system and intentional exposure to the atmosphere will be conducted under the supervision of TGP personnel. During these procedures, masking agents may be utilized to reduce the odor or flaring may be applied to eliminate the vapors during an intentional release. This odorization injection system is also controlled by programmed computers and is monitored remotely with 24 hour alarms.

Letter ID	Agency	Date	Summary	Response
			(13) first responder training and measures (14) road crossings	(13) Tennessee recognizes that public sector responders provide critical assistance in the mitigation of a pipeline incident,; therefore, employees are provided with an orientation on the Incident Command System so that they can effectively dovetail the company's response structure into that which will be established by the public sector Incident Commander. Tennessee conducts annual meetings with First Responders, local officials, and contractors in all counties, cities, and towns where it operates, and will continue this process in any locality after the pipeline is installed. These meetings provide First Responders with information about responding to a natural gas incident. Tennessee's local employees who operate the pipeline attend these meetings to answer questions and provide additional information related to emergency response, safety, and local contact information. These employees serve on the Local Emergency Planning Committee and regularly attend meetings within the counties where they live. As the proposed Project is constructed, placed in service, and operated as part of the TGP system, Tennessee will continue all of these activities in counties where its facilities are located and will begin those activities in counties where new facilities are added. In addition to the meetings, Tennessee conducts mock emergency drills with local responders and holds open houses at our facilities to better familiarize First Responders with Tennessee's equipment and facilities. Tennessee's personnel also have access to pipeline emergency training materials and, if requested, can provide workshops or training for first responders. (14) As described in Section 8.1.6.1.2 of Resource Report 8, temporary impacts associated with road crossings include disruption of traffic flows, identification and construction around existing underground utilities, such as water and sewer lines, and maintenance of emergency vehicle access. There will be no permanent effects on existing use of the roadways crossed by the Project. Table 8.1-9 summarizes the number of road crossings by segment. Table 8.1-10 in Attachment 8b of Resource Report 8 identifies the crossing method to be employed at each road crossing.
			(15) soil compaction and displacement (16) cultural resources discovery (17) construction monitoring (18) impacts to road access	(15) Tennessee will minimize and mitigate soil compaction through compliance with Tennessee's Plan and Procedures and implementation of the measures detailed in the state-specific Soil Protection and Subsoil Decompaction Mitigation Plan, which is Attachment 10 to the state-specific Environmental Construction Plans (ER, Volume II, Appendices J through N). (16) Tennessee will comply with the measures detailed in their Plan for Unanticipated Discoveries of Cultural Resources and Human Remains, which is included as Attachment 4d to Resource Report 4). (17) Tennessee will provide funding for a 3rd party construction monitoring program. (18) A travel lane is established as part of the construction temporary workspace. The travel lane provide for efficient construction and safety and allows travel along the ROW in case of emergency. Additionally, access around the construction areas will be provided for landowners/residents.

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			(19) pipeline corrosion due to induced electromagnetic fields from power lines (20) provisions for pipeline decommission if needed.	(19) The proposed pipeline shall be cathodically protected to provide external corrosion control in accordance with the Code of Federal Regulations (CFR) Part 192 regulations. Tennessee has hired a specialist engineering firm to design the cathodic protection (CP) system for the proposed pipeline. Impressed current using ground beds and rectifiers and galvanic systems are being considered. A portion of the proposed pipeline will be located adjacent to or co-located with high voltage electric power lines. The same specialist design engineering firm hired to design the CP system shall also design an alternating current ("AC") mitigation system that will protect the pipeline facilities and operations personnel from induced voltage. It is anticipated that the design will include installation of zinc ribbon installed in the pipeline trench, zinc grounding mats at aboveground facilities and other appurtenant equipment, most of which will be buried. The system selected will be based on many factors including soil resistivity, AC power line voltage, steady state AC current and ground fault current. Please refer to the draft Resource Report 1 (General Project Description) and Resource Report 11 (Reliability and Safety) filed with the FERC on July 24, 2015 as part of the draft Environmental Report for further discussion regarding CP and AC mitigation systems. (20) There are no plans for pipeline decommissioning at this time. Any decommissioning would require filing with FERC.
B	U.S. Fish and Wildlife Service	4/1/2015	Letter is a response to request for information on the presence of federally listed and/or proposed species and ecological resources. Comments are provided in accordance with section 7 of the ESA, MBTA, and BGEPA. Letter addressed portions of the project in MA, CT, and NH. (1) Two federally listed species occur in the vicinity of the project area, the Dwarf wedgemussel (*Alasmidonta heterodon*) and the northeastern bulrush (*Scirpus ancistrochaetus*). No critical habitat for these species occurs within the project area. Since the proposed project crosses habitat known to support dwarf wedgemussel, further consultation with USFWS regarding the project is recommended. A survey for dwarf wedgemussels should be conducted to determine presence or absence. If dwarf wedgemussels are present and adverse effects cannot be avoided, formal consultation is required. However, FERC may assume presence and initiate formal consultation if it is determined the project will adversely affect dwarf wedgemussels. Provide all project information and survey results to FERC, with a copy to USFWS, as FERC is responsible for making an effect determination pursuant to the ESA. (2) Two proposed species occur in the vicinity of the project, the New England cottontail rabbit (*Sylvilagus transitionalis*) and the northern long-eared bat (*Myotis septentrionalis*). (2.a) Consideration of the New England cottontail during project planning is strongly advised, since a determination to list this species under the ESA will trigger the need from consultation. (2.b) The project is located within the range of the northern long-eared bat. USFWS recommend that you review the Northern Long-eared Bat Interim Conference and Planning Guidance, until a determination whether to list the species has been made.	(1) Tennessee is currently investigating the feasibility of an approximately 1,600-foot HDD beneath the river system in Hartford County, Connecticut to avoid and minimize impacts to the dwarf wedgemussel. Tennessee biologists are currently developing a survey protocol that will be submitted to the New England USFWS Field Office for review. Upon approval from the USFWS, it will be sent to the CTNDDB for review. Surveys will be conducted for this species in 2015. Surveys for Northeastern bulrush will be conducted by a qualified botanist in wetlands where direct or indirect impacts are possible, provided that the wetland contains suitable habitat for this species. Tennessee will continue to correspond with CTNDDB and New England USFWS to identify appropriate habitats, conduct surveys, and develop impact avoidance and minimization measures as needed. Results of additional correspondences will be provided in a subsequent filing. (2.a) The New England cottontail is identified as potentially occurring in the Project area in Section3.4.2.1.3 of Resource Report 3. Tennessee will continue to correspond with NHNHB and New England USFWS to identify appropriate habitats, conduct surveys, and develop impact avoidance and minimization measures as needed. Results of additional correspondences will be provided in a subsequent filing. (2.b) Potential impacts to the Northern long-eared bat are described in Section 3.4.2.1.2 of Resource Report 3. Impact avoidance and minimization assessments are currently being developed by Tennessee. A study plan requested by the USFWS to map the subterranean extent of these hibernacula and then model the sound/vibration transmission associated with construction and operation of the Project is being developed. This will provide important information needed to develop appropriate setbacks and avoid disturbance to the hibernaculum.

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			(3) The northeast bulrush population that exists in Warwick is not within the vicinity of the proposed pipeline. In Montague, USFWS recommends that surveys of wetlands that will be impacted be conducted to determine if there is habitat capable of supporting the northeastern bulrush. (4) MBTA - Vegetation removal should not occur during migratory bird nesting season. Tennessee should consider impacts to birds within the Atlantic Northern Forest Bird Conservation Region (BCR) 14 and the New England/Mid-Atlantic Coast BCR 30 when developing avoidance, minimization, and mitigation measures. There is a MOU between FERC and USFWS regarding Implementation of Executive Oder 13186, "Responsibilities of Federal Agencies to Project Migratory Birds," which includes identification and evaluation of bird conservation measures and BMPs. To ensure compliance with the BGEPA, contact the States annually to obtain updated information on bald eagles in the project area.	(3) Surveys for Northeastern bulrush will be conducted by a qualified botanist in wetlands where direct or indirect impacts are possible, provided that the wetland contains suitable habitat for this species. (4) In order to minimize impacts associated with bald eagles, Tennessee performed aerial surveys by helicopter with one qualified biologist flying with the pilot. The BGEPA Management Guidelines recommend considering potential blasting impacts to Bald Eagles. To account for this, Tennessee biologists followed USFWS recommendations (Sullivan 2015a) and performed helicopter surveys within a one-mile corridor to either side of the centerline. Tennessee will also conduct additional nest surveys the spring season immediately prior to construction, as more new nests are likely to be added to the landscape. Avoidance/minimization measures for migratory birds will likely include species-specific surveys (Attachment 3b, Table 3.4-8) and/or timing restrictions based on agency consultations. Several agencies have already identified migratory birds as a conservation concern for the Project. The CTDEEP has recommended that large open fields or agriculture areas be avoided between May through August, or have an ornithologist conduct surveys prior to construction to assess habitat and/or determine presence of breeding birds (Riese 2014). In addition to a number of mitigation techniques outlined in Section 3.4.2.2.1, the PGC (Taucher 2015) has suggested initial tree clearing through or adjacent to large forest tracts, and future maintenance (mowing and/or clearing) along the existing ROW be conducted between August 15 and April 15. The Pennsylvania USFWS (Zimmerman 2014) also provided "Adaptive Management Practices for Conserving Migratory Birds," which recommends slightly more narrow winter vegetation clearing and ROW maintenance window of September 1 through March 31. Zimmerman (2014) presents additional avoidance and minimization recommendations including limiting construction activities to already disturbed areas where possible, avoiding fragmentation of large contiguous forest tracts, and avoiding areas where birds are highly concentrated such as state or federal refuges, IBAs, and breeding, roosting, and feeding areas. Finally, the NYSDEC has provided timing restrictions and survey recommendations for grassland bird habitats in New York (Novak 2015b). All agency correspondence is provided in Volume II, Appendix B of this ER.
C	Town of Amherst New Hampshire	3/24/2015	It is the judgment of the Town of Amhert Board of Selectmen that the proposed route through Amberst is poorly chosen with numerous adverse effects on the community. They hired a consultant which has prepared a preliminary EA of the project (attached). The town is concerned about: (1) Impacts to the town's unique historic, "small town" and semi-rural character, and removal of trees. (2) Impacts to Ponemah Bog. The bog is a unique and irreplaceable environment, requiring over 10,000 years to develop. The bog has very poor healing abilities. A section of the bog impacted over 70 years ago, has still not fully recovered. For this reason, any route that requires crossing and disrupting Ponamah Bog is completely unacceptable to the Town of Amherst.	(1) The amount of vegetation cleared will be limited to the removal of the minimum amount necessary for safe construction. (2) The Project centerline crosses the property for a total distance of approximately 1,195 linear feet. Although Tennessee has co-located the Project with an existing utility corridor to reduce impacts to local vegetation cover types, due to the sensitive nature of bog habitats, the appropriate crossing method is still being assessed by Tennessee and the full extent of impacts has not been determined at this stage. Impacts will be based on field review of the crossing location and correspondence with Audubon New Hampshire or other interested parties. Tennessee is also evaluating alternative routes to avoid this resource, if possible, as requested by the ACC. A discussion of these alternatives can be found in Resource Report 10. Results of these consultations will be communicated in the Final ER. Agency correspondence received as of the date of this resource report is provided in Volume II, Appendix B of the ER.

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			(3) Inconsistencies with the town's Master Plan goals.	(3) Tennessee has minimized impacts to existing and planned land uses to the extent practicable while still designing the Project to meet the Purpose and Need as defined in Resource Report 1. Tennessee has attempted to avoid and minimize impacts to sensitive land use resources by siting aboveground and appurtenant facilities within or adjacent to the permanent ROW and by selecting previously disturbed areas for use as contractor yards, to the maximum extent practicable and feasible. Similarly, impacts are being minimized associated with ARs by using existing paved roads, farm roads, agricultural sites and other disturbed open lands, and developed areas where possible. Alternative ARs will be selected to avoid sensitive land use resources when possible. Sites for proposed compressor stations were selected using existing GIS data sources, information from consultations where available, and field collected data associated with wetlands, waterbodies and vernal pools on parcels were access could be obtained. Sites containing sensitive wildlife habitats were avoided to the extent practicable. Tennessee is continuing to evaluate these potential compressor station locations and consult with the appropriate agencies. Tennessee has sited aboveground and appurtenant facilities in agricultural or disturbed areas and outside of sensitive land use resources to the extent practicable. Tennessee has also sited ARs and contractor yards outside of sensitive land use resources to the extent practicable. Temporary land used will revert to pre-construction conditions following construction and restoration. In addition, County planning agencies in the vicinity of the proposed Project in Pennsylvania, New York, Massachusetts, New Hampshire, and Connecticut and all town planning departments crossed by the Project in Pennsylvania, New York, Massachusetts, New Hampshire, and Connecticut have been contacted to identify any proposed future development within a 0.25-mile radius of the Project's pipeline facilities. Copies of all correspondence are provided in Volume II, Appendix B. Further contact with these agencies regarding planned developments within 0.25 mile of the compressor and meter stations will be conducted.

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			(4) Public Safety, including safety of residents of cul-de-sac neighborhoods with single access routes that will be bisected by the pipeline. (5) Impacts to the Souhegan River, including long-term concerns for the stability of soils where the pipeline crosses/is adjacent to the meandering Souhegan River. The Souhegan River experiences a considerable amount of fluvial erosion due to the nature of the soils.	(4) Tennessee is committed to public safety, protection of the environment, and operation of its facilities in compliance with all applicable rules and regulations. Natural gas pipelines fall under the regulatory oversight of PHMSA. Tennessee is proud of its safety record and its compliance with applicable safety regulations. With regard to the proposed bisecting of neighborhoods and crossing of cul-de-sac roads with a single point of access and egress, Tennessee incorporates additional safety factors into the design, including protective coatings and heavier wall pipe, in compliance with CFR 49 Part 192. A catastrophic event is highly unlikely with modern engineering practices and materials of construction. In the unlikely event of that emergency response is required, notifications will be made to 911, internal (control center), and external (National Response Center, State agencies, and other county/local and tribal groups, as necessary. An incident command system will be activated with Unified Command. Emergency Responders (e.g., fire, police, etc.) will conduct firefighting, search and rescue, evacuations, road closures, perimeter control, and hazmat response. The Emergency Responders will evaluate whether to evacuate or shelter-in-place (i.e., the public is advised to remain in their homes). During construction, a travel lane is established within the temporary work area. The travel lane, which provides for efficient construction and safety, allows travel along the ROW in case of emergency. Additionally, access around the construction areas will be provided for landowners/residents. (5) Tennessee anticipates providing mitigation for possible impacts resulting from construction through adherence to Tennessee's Plan and Procedures (ER, Volume II, Appendix H) as well as applicable state and federal permit conditions, which will be incorporated into the Project-specific ECPs for New Hampshire (ER, Volume II, Appendix M). Where temporary impacts to surface waterbodies cannot be avoided during construction activities, Tennessee will restore and stabilize these areas upon completion of pipeline installation to pre-construction conditions.
			(6) Crossing of Scott Conservation Land. Even if the Amherst Board of Selectmen were inclined to grant an easement across this conservation land it is legally prohibited from doing so.	(6) As described in Section 8.3.3.2.4, the proposed Project crosses protected conservation land (Scott Parcel) acquired through LCIP in Amherst. Tennessee is reviewing the impacts to these areas and will work with the Town of Amherst and the applicable agencies to avoid, minimize, or mitigate impacts to this area.

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D	Town of Townsend, Massachusetts, Conservation Commission	3/24/2015	The Townsend Conservation Commission opposes the proposed NED pipeline. They are concerned about impacts to State Parks, open space, rivers/surface waters, recreational areas, forests, aquifer, private wells and septic systems. The Town of Townsend offered to host the initial Open House for the project, at a location with sufficient space and parking at no cost. They are displeased that the Open House was held in Fitchburg, where no pipeline construction is proposed. Traveling to the Open House in the snow in February was difficult and the location had limited parking. Townsend would be honored to sponsor a scoping hearing if agreeable to FERC. The Townsend Conservation Commission requests the following criteria be included in your review of the pipeline application: (1) Evaluate the cumulative impacts of the five major pipeline projects planned for New England. (2) Do not count export as public necessity, the public harmed by the pipeline is not the same public that will obtain the export. (3) If all proposed alternative routes for the pipeline a problematic, rather than selecting the least problematic, go back to the drawing board.	Scoping meeting locations will be determined by the Commission. Responses regarding requested criteria to be included in the ER: (1) Cumulative impacts are addressed in each Resource Report of the ER. (2) NED is being developed specifically to provide much needed additional natural gas transportation capacity to New England for regional electric generation and local distribution companies who need the additional gas capacity to serve increasing customer demand in their New England service territories. Under FERC's regulations and policies, Tennessee cannot discriminate among customers based on the ultimate destination or use of the gas. At this time, Tennessee has not executed any contracts with developers of proposed LNG export facilities. (3) Tennessee undertook an extensive needs and alternative routing analysis for the Project. The primary objective in performing this analysis was to develop a project that will accomplish Tennessee's objective to provide up to 1.3 billion cubic feet per day ("Bcf/d") of additional natural gas transportation capacity to meet the growing energy needs in the Northeast U.S., particularly in New England, as is described in the Purpose and Need section of this filing (Resource Report 1, Section 1.1.1), while working to avoid or minimize potential adverse environmental impacts to the greatest extent practicable. Tennessee evaluated pipeline routing options based on regional topography, environmental considerations, population density, existing land usage, construction safety, and feasibility considerations. Tennessee also considered route alternatives in conjunction with the Commission's routing guidelines as set forth in Section 380.15 of the Commission's regulations.

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			(4) In the economic analysis do not dismiss the option of not building the pipeline. The assumption that there is not economic benefit from not building the pipeline may be misguided and does not take into account ecosystem services, property values, opportunities for renewable-energy projects, with permanent job creation, and the cost of health problems and emergency preparedness and response. (5) Consider the effects of methane leaks and combustion from the proposed pipeline. (6) When comparing alternative consider the quality of habitats and resources, not just the quantity.	(4) The "No-Action" Alternative for the Project will avoid the temporary and permanent environmental impacts associated with construction and operation of the currently proposed Project. However, by not constructing the proposed Project, Tennessee will be unable to provide the necessary natural gas transportation service required to meet growing energy needs in the Northeast U.S., specifically New England. (5) Methane, the primary component of natural gas, is colorless, odorless, and tasteless. It is not toxic, but is classified as a simple asphyxiant, possessing only an inhalation hazard. As with all gases, if inhaled in high enough concentration, oxygen deficiency could occur and result in suffocation. Given the unconfined, outdoor conditions of the pipeline right-of-way ("ROW") for the Project's pipeline facilities, asphyxiation from a pipeline leak is improbable. Methane is inactive biologically and essentially nontoxic. It is not listed in the International Agency for Research on Cancer, National Toxicology Program, or by the Occupational Safety and Health Administration ("OSHA") as a carcinogen of potential carcinogen. (6) Resource Report 3 describes the existing terrestrial wildlife, vegetation, and fisheries resources within the proposed Project area, the potential impacts from construction and facility operation on these resources, and proposed methods designed to reduce and mitigate impacts on these resources. Information presented in this Resource Report was obtained from three principal sources: (1) Project-specific communication with federal and state agencies; (2) published and unpublished natural resources data pertaining to the regional Project area; and (3) biological field surveys. The field surveys, which include wetland delineations and habitat evaluations, were conducted in the summer and fall of 2014 with additional surveys continuing throughout 2015 where access is available.
			(7) The FERC analysis of alternate energy projects needs to be updated to consider solar installations on private property and combinations of renewable energy.	(7) As increasing demand for electricity continues to rise, energy efficiency and conservation measures, along with more diversified renewable energy portfolios, will reduce the need to meet the growing demand by fossil-fueled power plants. In recognition of the need to diversify, the states in the Project area have all adopted policies, programs, and projects to reduce their state's dependence on fossil-fuel electric generation. While these measures could impact the overall demand for electricity from fossil fuel generation, the energy conservation and renewable alternative does not meet the needs of the Project, which will provide natural gas transportation service to LDCs to provide additional natural gas supplies to their customers for residential and commercial heating, drying and cooking, and industrial uses. Accordingly, energy conservation and renewable resources will not be an alternative to meet the purpose and needs of the Project.

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E	Town of Warwick, Massachusetts	3/9/2015	The Town of Warwick requests the following issues be addressed: (1) Why is the new pipeline not sized for the projected demand/need? (2) If the New England demand for natural gas is great, why would TGP suggest exporting gas out of the country? (3) The stated goal by TGP is to reduce gas prices and assure supplies in New England. The issue of price in relation to exporting gas out the country should be looked at and documented. (4) MA law to cover trenches at night should be addressed.	(1) The purpose of the project is to create new natural gas transportation capacity to meet the growing demand for natural gas transportation capacity in the Northeast U.S. The new capacity created will help reduce natural gas costs for homes and businesses in the region, lower electricity rates, increase the reliability of the electric grid, and stimulate economic growth. (2) NED is being developed specifically to provide much needed additional natural gas transportation capacity to New England for regional electric generation and local distribution companies who need the additional gas capacity to serve increasing customer demand in their New England service territories. Under FERC's regulations and policies, Tennessee cannot discriminate among customers based on the ultimate destination or use of the gas. At this time, Tennessee has not executed any contracts with developers of proposed LNG export facilities. (3) NED is being developed specifically to provide much needed additional natural gas transportation capacity to New England for regional electric generation and local distribution companies who need the additional gas capacity to serve increasing customer demand in their New England service territories. Under FERC's regulations and policies, Tennessee cannot discriminate among customers based on the ultimate destination or use of the gas. At this time, Tennessee has not executed any contracts with developers of proposed LNG export facilities. (4) Tennessee will temporarily place steel plates over the trench during non-working hours.
			(5) Potential impacts to private wells and septic systems. (6) Wetland impacts, even temporary, require wetland replication. This is a critical issue to address. (7) Permits, Licenses, Approvals and Certifications Table 1.6-1 should include; MGL Chapter 61 - The Forest Tax Law; MGL Chapter 184, § 30-33 - Conservation Lands; MGL Chapter 40, § 15C - Scenic Roads; MGL Chapter 87, § 1-6 - Shade Tree Law; MGL Chapter 40A and Zoning By-laws for the Town of Warwick Section Two.	(5) Tennessee has agreed to perform pre- and post-construction monitoring for well yield and water quality for private wells within 200 feet of the proposed construction workspace. Tennessee would monitor water quantity parameters including water column height, flow rate of existing equipment, water column drawdown, rebound time, volatile organic compounds, total petroleum hydrocarbons, and compounds used in blasting (if blasting has occurred nearby). Should the integrity of any water supply well be impacted during construction, either water quantity or quality, Tennessee would provide an alternative water source or compensate the landowner for a new, comparable well. (6) Tennessee will consult with the applicable federal and state regulatory agencies for guidance during development of the proposed mitigation measures and plans, and will incorporate specific recommendations of the agencies. As these permit applications are developed and approved, including required mitigation for impacts to wetlands, these permits, including mitigation provisions, will be provided to the Commission. (7) Suggested inclusions are laws and do not require an environmental permit, license, approval, or certificate. Therefore, they are not included in Table 1.6-1.

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			(9) Explain why there is no apparent effort to avoid critical habitat. (10) The data source for vernal pools should be stated and possible updated with more recent data. (11) Energy Conservation RR-10, Section 10.1.1 is inadequate.	(9) Section 7 of the federal ESA (16 USC Subsection 1531-1543) requires each federal agency to ensure that any action authorized, funded, or carried out by the agency does not jeopardize the continued existence of federal-listed threatened or endangered species, or result in the destruction or adverse modification of the designated critical habitat for any federal-listed threatened or endangered species. The Commission, as the lead agency in the review of the proposed Project, consults and/or confers with the USFWS to determine whether any federal-listed species or species proposed for federal listing, or their designated critical habitat may occur in the Project area, and to determine the Project's potential effects on these species and/or critical habitats. Tennessee avoids Critical Habitat when practicable. In instances where impacts to critical habitat are unavoidable, Tennessee will continue to consult with the USFWS to determine methods to minimize and/or mitigate impacts to critical habitat. (10) During the spring of 2015 Tennessee qualified biologists performed vernal pool surveys on all properties where access was available. Surveys included all temporarily flooded palustrine wetlands and flooded isolated depressions encountered that might support vernal pool communities. Vernal pool surveys will continue as more properties become available. Impacts to each pool's adjacent landscape will be assessed following requirements outlined by the United States Army Corps of Engineers ("USACE") New England District under the Massachusetts Programmatic General Permit ("MA PGP"). Tennessee will consult with the Massachusetts NHESP to avoid and minimize direct impacts to vernal pools and impacts to their associated critical terrestrial habitat to the extent practicable. Results of these consultations will be communicated in the final ER. (11) Additional information regarding energy conservation has been added
			(12) Request the service area be limited to New England and that no export of gas from this pipeline be allowed. (13) Impacts to New England for export to Europe and Asia. (14) The total impact of the 2% tariff on the cost of the pipeline to the applicant and to the customers over the life of the tariff and the life of the pipeline should be included in RR. (15) The constitutional impact of taking private land by eminent domain for a pipeline that will export gas should be explaining if the service area is not limited to New England. (16) Route Alternative Analysis needs to address the quality/value of wetlands.	(12) NED is being developed specifically to provide much needed additional natural gas transportation capacity to New England for regional electric generation and local distribution companies who need the additional gas capacity to serve increasing customer demand in their New England service territories. Under FERC's regulations and policies, Tennessee cannot discriminate among customers based on the ultimate destination or use of the gas. At this time, Tennessee has not executed any contracts with developers of proposed LNG export facilities. (13) NED is being developed specifically to provide much needed additional natural gas transportation capacity to New England for regional electric generation and local distribution companies who need the additional gas capacity to serve increasing customer demand in their New England service territories. Under FERC's regulations and policies, Tennessee cannot discriminate among customers based on the ultimate destination or use of the gas. At this time, Tennessee has not executed any contracts with developers of proposed LNG export facilities. (14) The proposed Project is not relying on any subsidies to be built; rather, NED is a standalone project that will be paid for by Tennessee and supported by our customers who enter into firm transportation capacity commitments on the pipeline. (15) Section 7(h) of the Natural Gas Act provides that a certificate holder may obtain the property necessary to construct and operate the project through eminent domain. (16) The route alternatives analysis considers the total number of wetlands,

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			(17) Impacts of overweight trucks on rural roads and bridges. (18) Consider eminent domain take in each alternative compared to the preferred route. (19) Add New England Scenic Trail to analysis. Each crossing of a national trial should be addressed individually. (20) Impacts to operation of the Guabbin to Cardigan species corridor. (21) Spread of invasive species through pipeline corridor.	(17) Tennessee and its contractors will comply with local weight restrictions and limits and keep roads free of soils that may be deposited by construction equipment. When necessary for equipment to cross roads, mats or other appropriate measures (e.g., sweeping) will be used to reduce deposition of mud. Road surfaces in the general area are not expected to be affected by heavy equipment because such equipment will be restricted to off-roadway operation once it reaches the Project area. (18) The use of Eminent Domain is unknown at this time. Tennessee will negotiate with each individual landowner to obtain the required land for the project. Eminent Domain will only be used as a last resort. (19) Crossings of the New England Scenic Trail have been considered during review of the route alternatives. Additionally, route deviations have been incorporated to avoid impacts to the trail. (20) There will be no impacts to the Guabbin to Cardigan species corridor. (21) Tennessee will protect and minimize potential adverse impacts to vegetation by complying with the Invasive Species Management Plan included as Attachment 9 of each state-specific ECP (Volume II, Appendices J, K, L, M, and N).
			(22) Impacts to Native American historic and religious sites. (23) Consider alternative route along Route 90, Route 2 of the railroad right-of-way.	(22) As part of the National Environmental Policy Act ("NEPA") pre-filing process for the Project, Tennessee has provided notification regarding the Project with 20 Native American tribes to assist with the FERCs consultation process under Section 106. Initial contact was made by notification letters sent by Tennessee's cultural resources consultant to the identified Native American tribes on October 2, 2014. On October 21, 2014, Tennessee's cultural resources consultant sent follow-up correspondence to the Native American tribes inquiring about sites of religious or cultural significance to Native American tribes that could potentially be affected by the Project. Tennessee's cultural resources consultant subsequently followed up with each tribe conveying an interest in consultations regarding the Project. As the Project progresses, the FERC, Tennessee, and its cultural resource contactor continue to work with tribes who have interests in the Project. (23) Agency requested route deviations have been included and analyzed in Section 10.3.3.2 in Resource Report 10.

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F	Town of Mason, New Hampshire	2/4/2015	Request assistance in preventing potential violations of Mason's conservation easements and threats to conservation lands by the project, including: (1) Fifield Tree Farm Conservation Easement, (2) Spaulding Brook Conservation Land, (3) Doonan Conservation Easement, (4) Mason Railroad Trail, (5) Mitchell Hill Conservation Land.	Potential impacts to state conservation lands are addressed in Sections 8.3.1.1.2 and 8.3.3.2.4. (1) The Project is proposed to cross the Fifield Tree Farm along an existing easement. However, Tennessee is reviewing this crossing and impacts to the area and will work with the Town of Mason and the applicable agencies to avoid, minimize, or mitigate impacts to this farm. (2) The 163-acre Spaulding Brook Conservation Land would be crossed by the proposed Project along an existing easement. Tennessee is reviewing this crossing and impacts to the area and will work with the Town of Mason and the applicable agencies to avoid, minimize, or mitigate impacts to these properties. (3) The 12.5-acre Doonan Conservation Easement would be crossed by the proposed Project along an existing easement. Tennessee is reviewing this crossing and impacts to the area and will work with the Town of Mason and the applicable agencies to avoid, minimize, or mitigate impacts to these properties. (4) The Project crosses the Mason Railroad Trail three times: once in Greenville and twice in Mason. The rail trail follows a heavily wooded corridor through Russell State Forest and the Coyne Wildlife Sanctuary. Tennessee will work with the NHDRED, Town of Mason, and applicable agencies and organizations to assess impacts to the trail and avoid, minimize, or mitigate those impacts. (5) The Mitchell Hill Conservation Land that would be crossed by the proposed Project along an existing easement. Tennessee is reviewing the impacts to this area and will work with the Town of Mason and the applicable agencies to avoid, minimize, or mitigate impacts to this area.

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G	Ashby Board of Health, Town of Ashby, Massachusetts	11/23/2014	The Ashby Conservation Commission requests that the FERC consider some of the special aspects of the Town of Ashby: (1) Almost entire town is on private water supplies (i.e., wells). Blasting has been required for construction within the past 20-30 years and each time surrounding wells were negatively affected. (2) All waters in Ashby have the designation of Outstanding Water Resource and require a 401 WQ Certificate. (3) Because all waters are OWR, would can only be conducted during specific times of the year. (4) Request an EIS instead of an EA.	(1) Tennessee has agreed to perform pre- and post-construction monitoring for well yield and water quality for private wells within 200 feet of the proposed construction workspace. Tennessee would monitor water quantity parameters including water column height, flow rate of existing equipment, water column drawdown, rebound time, volatile organic compounds, total petroleum hydrocarbons, and compounds used in blasting (if blasting has occurred nearby). Should the integrity of any water supply well be impacted during construction, either water quantity or quality, Tennessee would provide an alternative water source or compensate the landowner for a new, comparable well. (2) Federal authorization from the USACE under Section 10 of the Rivers and Harbors Act (33 U.S. Code [“USC”] 401 et seq.) will be required for the construction of the pipeline facilities in or under any “navigable waters” of the U.S. crossed by the Project. Federal CWA Section 404 authorization will be required for dredge and fill activities associated with construction in wetlands and designated Waters of the U.S. CWA Section 401 Water Quality Certification will be required from the PADEP, NYSDEC, MADEP, NHDES, and CTDEEP for waterbody and wetland crossings. Surface water withdrawal permits are administered for each state by the PADEP, NYSDEC, MADEP, NHDES, and CTDEEP in Pennsylvania, New York, Massachusetts, New Hampshire, and Connecticut, respectively. Tennessee will comply with all applicable regulations required by state agencies and seek permits for any water withdrawal exceeding state-mandated threshold limits. (3) Tennessee will comply with all applicable regulations required by state agencies and seek permits for any water withdrawal exceeding state-mandated threshold limits. (4) FERC will prepare an EIS for the Project.
H	Town of Wilmington, Massachusetts	1/20/2015	(1) The Town of Wilmington opposes the project as currently defined. They have met with KM twice to review the plans and point out areas of critical concern. They request another meeting with KM to pursue alternative routes for the portion of the Lynnfield Lateral extending through Wilmington. (2) Concerned about impacts to the Massachusetts Department of Environmental Protection designated Zone I Area for both the Browns Crossing and Salem Street wells fields and affects to well drinking water quality. (3) Concerned about impacts to wetlands, buffer zones, riverfront areas, vernal pools, historic Town-owned properties. (4) Concerned about proximity to residential areas and hospitals. (5) They assert the pipeline should be located in more appropriate areas such as the existing utility corridor, not through the Town's public drinking water supply.	(1) Tennessee has held additional meetings with the Town of Wilmington in February and April 2015. (2) Information regarding the Browns Crossing and Salem Street well fields is provided in Section 2.1.5.1.3 of Resource Report 2. Tennessee recognizes that construction of the gas pipeline and perpetual maintenance (i.e., vegetation clearing and growth control) of a 50-foot corridor will adversely impact these extremely sensitive Zone 1 areas. Tennessee will continue consultation with local governments to determine avoidance and minimization measure in this area. (3) Impacts to wetlands, surface waters, and vernal pools are addressed in Resource Report 2. Impacts to historic properties are addressed in Resource Report 4. (4) Residential Construction Plans depicting tract number and associated mitigation have been prepared for residences located within 50 feet of the construction work area and are included in Volume II, Appendix P of the ER. (5) Tennessee is currently proposing to co-locate the proposed pipeline with the existing utility corridor through Wilmington to avoided the Town's public drinking water supply.

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I	Town of Wilmington, Water and Sewer Department	1/28/2015	The Wilmington Water & Sewer Commission opposes the project as currently defined. They are concerned about the route passing through the Massachusetts Department of Environmental Protection (MassDEP) designated Zone I Area for both the Browns Crossing and Salem Street well fields. The Town of Wilmington depend on these wells for its drinking water supply. According to MassDEP regulation 310 CMR 22.21, *current and/or future land uses within the Zone I wellhead protection area are limited to those directly related to the provision of public drinking water or will have no significant adverse impact on water quality.*	Information regarding the Browns Crossing and Salem Street well fields is provided in Section 2.1.5.1.3 of Resource Report 2. Tennessee recognizes that construction of the gas pipeline and perpetual maintenance (i.e., vegetation clearing and growth control) of a 50-foot corridor will adversely impact these extremely sensitive Zone 1 areas. Tennessee will continue consultation with local governments to determine avoidance and minimization measure in this area.
J	The Commonwealth of Massachusetts, Historical Commission	5/1/2015	The Massachusetts Historical Commission letter provides comments on the State Archaeologist's permit application for reconnaissance archaeological surveys. They request additional information about the project, archeological resources and above-ground historic properties. They have not yet received a response from FERC on prior comments dated October 1, 2014 and November 5, 2015 and look forward to FERC commencing consultation.	As described in Section 4.5.3 of Resource Report 4, only initial consultation and background research have been conducted in Massachusetts. Preparation of the permit application to conduct reconnaissance archaeological surveys in Massachusetts is ongoing.
K	The Heritage Commission of the Town of Richmond, New Hampshire	2/6/2015	The Heritage Commission of the Town of Richmond opposes the proposed NED pipeline project for the negative impacts it will have on the town's historical and cultural sites, because it is contrary to the vision of the town expressed in its Master Plan, because it is contrary to the town's stated position against unsustainable energy sources, and disruption of open land, aquifers and watersheds, wildlife corridors and natural habitat.	Tennessee is committed to avoiding sensitive resources to the extent practicable. When unavoidable, Tennessee will work with the applicable federal and state agencies to minimize and/or mitigate impacts to these sensitive resources.

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L	Town of Tewksbury, Massachusetts	4/27/2015	The Town of Tewksbury has concerns about the pipeline crossing through dense residential neighborhoods in Tewksburg and Andover and hardships to residents. They request that KM consider modifying the current proposed pathway to minimize residential impacts. They have proposed three potential modification to lessen impacts on residential neighborhoods: (1) Alternative 1 - Haverhill Lateral Co-localization, (2) Alternative 2 - High Plain Crossing, (3) Alternative 3 - 495 Co-localization.	After a thorough analysis of these possible re-routes, including existing infrastructure, parcels, and geography, Tennessee has determined that we will continue to pursue our currently proposed route for the Project through Tewksbury for the following reasons: (1) Alternative Re-Route 1- Haverhill Lateral Co-Localization- Due to the fact that the existing Maritimes Line, Haverhill Lateral, and existing power line all run in the same utility corridor, construction of an additional pipeline within this corridor would be not be feasible without excessive encroachments on nearby properties and neighborhoods due to congestion. There are additional constructability concerns for the new pipeline given the close proximity to the two existing pipelines, such as structures that are built up to the roadway of I-93 we well as bridge abutments and concrete piers. Based on these considerations, the proposed route is preferred. (2) Alternative Re-Route 2- High Plain Crossing- Due to the slope alongside the bank of the Merrimack River, constructing a pipeline in this area would require clearing of a false right-of-way for the pull back and additional environmental impacts would occur due to close proximity of the river. Additionally, co-location with existing utility corridors would decrease and new (greenfield) pipeline would cross additional Article 97 Commonwealth owned lands. Based on these considerations, the proposed route is preferred. (3) Alternative Re-Route 3- I-495 Co-Localization- As with the High Plain Crossing, this reroute would increase new (greenfield) Article 97 Commonwealth owned land disturbance. Also, construction of pipeline parallel to highways/interstates is not preferred due to structures built up to the road easement and bridge abutments. Additionally, access to the site would disturb additional landowners since it is unlikely the highway department will allow access to the construction site on or off the Highway. Due to these considerations, the proposed route is preferred.
	Town of Tewksbury, Massachusetts, Conservation Commission		The Tewksbury Conservation Commission is concerned about impacts to the Open Space parcel located behind 40 Bonnie Street which is protected due to its unique ecological value and vernal pools	During the spring of 2015 Tennessee qualified biologists preformed vernal pool surveys on all properties where access was available. Surveys included all temporarily flooded palustrine wetlands and flooded isolated depressions encountered that might support vernal pool communities. Vernal pool surveys will continue as more properties become available. Impacts to each pool's adjacent landscape will be assessed following requirements outlined by the United States Army Corps of Engineers ("USACE") New England District under the Massachusetts Programmatic General Permit ("MA PGP"). Tennessee will consult with the Massachusetts NHESP to avoid and minimize direct impacts to vernal pools and impacts to their associated critical terrestrial habitat to the extent practicable. Results of these consultations will be communicated in the final ER.

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M	U.S. Army Corps of Engineers	4/24/2015	The USACE provides comments on the Draft Environmental Resource Reports. RR No. 1 (1) § 1.1.1 Purpose and Need fails to provide an in-depth discussion as it pertains to environmental documentation. (2) § 1.1.3 Once the location of all project elements have been identified, including new compressor station the USACE will likely carry out site inspection of these proposed areas to verify their location and provide comment on their placement. (3) § 1.2, 1.2.3, 1.2.4 & 1.2.5 USACE will provide more comment on quantification of land impacts once more information becomes available, including access for aquatic resource delineations and alignment revision in response to public, agency and stakeholder requests. (4) § 1.2.6 & 1.2.7 Publically available data sources do not typically account for ephemeral streams/drainages, seeps, springs, etc. Prior to making a permit decision USACE will need field delineations of all parcels proposed to be impacts by the project. (5) § 1.9 USACE request the Cumulative Impact Analysis include both the 404 Guidelines and the Public Interest Review Factors.	RR No. 1 (1) The purpose of the Project, to create new natural gas transportation capacity to meet the growing demand for natural gas transportation capacity in the Northeast U.S., particularly New England, is clear. The new capacity created by the Project will help reduce natural gas costs for homes and businesses in the region, lower electricity prices, increase the reliability of the electric grid, and stimulate economic growth. The Project will also have ancillary environmental benefits by reducing the region's reliance on GHG-emitting coal and oil-fired power plants. The Public Convenience and Necessity section of the certificate application for the Project will include further discussion of the purpose and need for the Project. The certificate application for the Project, including a final version of Resource Report 1, is anticipated to be submitted to the Commission in October 2015. Environmental documentation is provided in Resource Reports 2 through 13. (2) Compressor Station locations were filed with the Commission on June 1, 2015. Locations of other aboveground and ancillary facilities are provided in Resource Reports 1 and 8. (3) Additional information has been provided in the July 2015 filing of the ER. As surveys are ongoing, the ER will be updated and the Final ER will be filed with the Commission in the fourth quarter of 2015. (4) Tennessee is currently conducting field surveys to identify all waterbodies, seeps, springs, etc., where access has been granted. (5) This cumulative impacts analysis generally follows the methodology set forth in relevant CEQ and U.S. Environmental Protection Agency ("USEPA") guidance. Under these guidelines, inclusion of projects within the analysis is based on identifying commonalities of impacts from other projects to potential impacts that will result from the proposed NED Project.

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			RR No. 2 (1) § 2.2.1 Cannot provide a summary of all waterbodies crossed by the Project as classified by the Commission's Procedures until the entire ROW has been field surveyed and all streams, including ephemeral streams have been identified. USACE recommends the statement and Table Name be amended. - (2) Revise the protocol for estimating stream crossing length in the absence of field survey data. The protocol of assuming 3-foot crossing length is not accurate. - (3) Table 2.2-5 does not account for ephemeral streams and the number represent approximations. (4) § 2.2.2 Cannot state not long-term or permanent impact to surface water resources until all surface waters are field surveyed. - (5) § 2.2.11 USACE will require 'before' and 'after' photos of each stream crossing to ensure compliance with USACE restoration requirements and third-party post-construction monitoring. -	RR No. 2 (1) Waterbodies that will be crossed by the pipeline routes are listed in Tables 2.2-4 through 2.2-8 in Attachment 2b. The tables provide the locations, characteristics, regulatory and size classifications, restrictions, and proposed crossing methods for individual waterbodies in Pennsylvania, New York, Massachusetts, New Hampshire, and Connecticut, respectively. The information presented in the tables was collected through field surveys conducted in 2014 for land parcels with landowner access and use of GIS National Hydrography Dataset (“NHD”) produced by the USGS, state GIS data layers for areas where land access has not been permitted. Tennessee will complete waterbody surveys as access is granted. (2) For non-surveyed waterbodies shown as a single line feature on the Project alignment sheets, the stream crossing length was determined from a desktop analysis using Google Earth and/or ArcGIS. A crossing length of 0 feet indicates that a waterbody is within the construction workspace limits, but does not cross the pipeline. (3) Waterbodies that will be crossed by the pipeline routes are listed in Tables 2.2-4 through 2.2-8 in Attachment 2b. The tables provide the locations, characteristics, regulatory and size classifications, restrictions, and proposed crossing methods for individual waterbodies in Pennsylvania, New York, Massachusetts, New Hampshire, and Connecticut, respectively. The information presented in the tables was collected through field surveys conducted in 2014 for land parcels with landowner access and use of GIS National Hydrography Dataset (“NHD”) produced by the USGS, state GIS data layers for areas where land access has not been permitted. Tennessee will complete waterbody surveys as access is granted. (4) Tennessee will complete waterbody surveys as access is granted. (5) Before and after photos will be provided to the USACE as part of the permit process.

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			(6) § 2.2.11.1.1 USACE does not support wet open cut trenching for stream crossings. Any stream crossings should use the dry crossing methods. (7) § 2.3.1.2 Add information about federally regulated wetlands. Clarify that except for several specific exemptions and exclusions, under Section 404, the USACE regulates aquatic resources, including wetlands regardless of size, and streams that exhibit perennial, intermittent, and ephemeral flow regimes. - (8) Tables 2.3-3 & 2.3-4 Clarify if temporary and permanent impacts. The absence of mapped NWI wetlands cannot determine USACE regulated wetlands are not present. - (9) § Prepare a mitigation plan following Title 33 Code of FR.	(6) Tennessee is evaluating stream crossings on a case-by-case basis and will coordinate proposed crossing methods with state and federal agencies. (7) Tennessee identified, located, classified, and delineated wetland resources within and adjacent to the Project area through field surveys conducted in 2014. Jurisdictional wetlands crossed by the Project in Pennsylvania, New York, Massachusetts, New Hampshire, and Connecticut were field delineated in accordance with the USACE Wetlands Delineation Manual (USACE 1987) and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Northcentral and Northeast Region (USACE 2012). (8) Tennessee identified, located, classified, and delineated wetland resources within and adjacent to the Project area through field surveys conducted in 2014. Field surveys will continue throughout the 2015 field season, as survey access permission is granted. For properties without negotiated survey access, the schedule for the completion of field surveys may extend past the issuance of a Certificate of Public Convenience and Necessity should the Project be approved by the FERC. Tables 2.3-3 and 2.3-4 will be updated as data becomes available. (9) Tennessee will consult with the applicable federal and state regulatory agencies for guidance during development of the proposed mitigation measures and plans, and will incorporate specific recommendations of the agencies. As these permit applications are developed and approved, including required mitigation for impacts to wetlands, these permits, including mitigation provisions, will be provided to the Commission.
			<u>RR No. 3</u> (1) § 3.1.2.3 Explain that streams are co-regulated by USACE and that the project will impact numerous streams not regulated by the NYSDEC. - (2) §3.1.3 No wet open cut crossings should be allowed. (3) Clarify what is meant by 'restored to pre-construction conditions and stabilized'? Disturbed stream banks should be replanted with trees and shrubs in addition to herbaceous cover. (4) § 3.1.4 replanting stream banks should be method of minimizing and mitigating impacts. - (5) § 3.2.1.8 Width parameters for identifying waterbodies should be removed from the evaluation methodology. The methodology should include all streams, regardless of width or flow regime.	<u>RR No. 3</u> (1) Tennessee will prepare and submit applications for Section 404 and Section 10 permits for crossings of Waters of the U.S. (2) Tennessee is evaluating stream crossings on a case-by-case basis and will coordinate proposed crossing methods with state and federal agencies. (3) Specific restoration methods for restoration to pre-construction conditions are provided in the state-specific ECPs. (4) In order to minimize impacts at all waterbody crossings, waterbody substrates, banks and riparian zones will be restored immediately following completion of construction. Restoration will include installation of temporary sediment barriers, revegetation with native herbaceous and woody shrub species, native upland and wetland seed mixes, and soft-engineering techniques such as erosion control fabrics (e.g., jute netting) or coir-fiber rolls as necessary. (5) Width parameters have been provided as these waterbodies provide habitat for many waterfowl species. Other streams and rivers less than 10 feet in width are described in Resource Report 2.

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			(6) § 3.2.2.6 Forested wetlands outside the ROW should be replanted with native trees at a rate of 500 stems per acre. - (6) § 3.4 USFWS has sampling protocols for select species that should be used. - (7) Table 3.4-1 Northern long-eared bat is Threatened. <u>General</u> A USACE permit decision can be made only after the entire pipeline ROW has been delineated and all impacts to waters of the U.S. (WOUS) are accurately assessed. Need 8"x11" b&w engineer drawings of impacts. USACE cannot issue a permit decision for a project until all required consultations under NEPA are completed.	(6) Tennessee will minimize impacts on wetlands through implementation of the Plan and Procedures (Volume II, Appendix H) and incorporated into the Project-specific ECPs for each state (Volume II, Appendices J, K, L, M, and N). Construction will protect and minimize potential adverse impacts to wetlands by expediting construction in and around wetlands, by restoring wetlands to their original configurations and contours, by segregating topsoil during excavation where applicable, by permanently stabilizing upland areas near wetlands as soon as practicable after backfilling, by inspecting the ROW periodically during and after construction and by repairing any erosion control or restoration features until permanent revegetation is successful. Tennessee will consult with the applicable federal and state regulatory agencies for guidance during development of the proposed mitigation measures and plans, and will incorporate specific recommendations of the agencies. As these permit applications are developed and approved, including required mitigation for impacts to wetlands, these permits, including mitigation provisions, will be provided to the Commission. (6) In many cases, sampling protocols developed by specific agencies will be implemented at the agencies request. When existing protocols are not available, Tennessee's qualified wildlife biologists and botanists will develop sampling protocols for various plants, invertebrates, birds, and mammals that are known to be in or near the Project area, and seek approval from appropriate agencies. Species-specific surveys will take place throughout 2015. (7) Table 3.4-1 has been updated. <u>General</u> Applications for CWA Section 404 permits will be submitted to the USACE in the fourth quarter of 2015.
N	Berkshire Regional Planning Commission	5/7/2015	The RR are missing/have incomplete data, notability the specific location of proposed compressor stations. Berkshire Regional Planning Commission request that FERC delay the Notice of Intent and the scoping meetings until such time as the Tennessee Gas Pipeline Company has provided a more complete set of Resource Reports. If the Notice of Intent is not delayed, then we respectfully request that the comment period be extended or re-opened to allow at least a 30 day comment period from when a more complete set of Resource Reports are filed.	Tennessee filed the compressor station locations on June 1, 2015 and supplemented on June 5, 2015. FERC is responsible for publishing the NOI and extending the public comment period.
O	New York State Department of Environmental Conservation	5/12/2015	Department staff do not agree with the conclusion that the Interstate-88 Alternative has received sufficient review and analysis. Department staff has determined that the record, in order to be complete, needs to include evaluation of an alternate route (the Hybrid Alignment described within). Department staff requests that TGP provide detailed construction and engineering analyses of the Hybrid Alternative, as discussed below, in Revised Resource Reports and in the DEIS. Staff concluded that Alternative M would result in fewer overall natural resource impacts than Constitution's conditionally approved route, but use of the Hybrid Alignment could better balance the competing impacts.	Tennessee has met with the NYSDEC and has agreed to perform additional analysis. This analysis will assume that the Constitution Pipeline is constructed on its certificated route, which does not include the hybrid alignment.