Comcast and NSTAR Electric – Responses to Comments (1-5-13)

Martha's Vineyard Commission
DRI #641 Comcast NSTAR Hybrid Undersea Cable
MVC Staff Report – 2013-01-24

Below we provide the comments from the MVC Staff report and public in bold, followed by our responses.

Planning Concerns

3.1 Some Key Issues

Habitat Time of Year Restrictions: Will the drilling and excavation work be done at times of the year that will not disturb migratory marine or bird life?

Based on consultations regarding the use of HDD and the avoidance of impacts, the Massachusetts Division of Marine Fisheries (DMF) has determined that no time-of-year (TOY) restrictions are necessary to protect marine resources.

On January 2, 2013, the Natural Heritage & Endangered Species Program (NHESP) issued a letter to the Tisbury and Falmouth Conservation Commissions, and Comcast and NSTAR Electric affirming that that project will not adversely affect the actual Resource Area Habitat of state-protected rare wildlife species and therefore it is their opinion the project meets the state-listed performance standard for the issuance of an Order of Conditions. They also indicated that based on their review, the project as currently proposed, will not result in a prohibited "take" of state-listed rare species pursuant to the MA Endangered Species Act Regulations (321 CMR 10.18). No TOY restrictions are required to avoid impacts.

Will the drilling and excavation work be done at a time of year that least impacts neighbors?

Work in Tisbury is scheduled to occur in Fall 2013. As such, the construction schedule will avoid the busiest periods of recreation and boating activities, which will help minimize potential disruptions to abutters as well as temporary restrictions to navigation in the vicinity of Project installation activities. The Proponent has communicated with various neighbors who initially had questions about the installation activities, and in response has made slight changes to the site access route for equipment, vegetation removal and restoration, and easement road widening. These changes will further minimize potential impacts to neighbors.

Is there capacity in the conduit for future co-location of cables?

No. The conduit proposed for this Project is only large enough for the proposed hybrid cable. Furthermore, a future electric cable may not make landfall at this location to minimize distribution work on the island.

Will construction or maintenance impact the rural dirt road and/or sand dunes?

The Project has been located landward of the coastal dune and it will result in no impacts to this resource area. Also, the project will utilize swamp mats to avoid impacts to the rural dirt road known as Squantum Avenue. Also, impact to Main Street has been addressed by having the construction equipment enter the work zone via Golf Club Way and then down the existing NSTAR right-of-way. Potential impacts to Squantum Avenue will be minimized by using timber matting to protect the path, adjacent wetlands, and trees along the road.

What measures are being taken to ensure the integrity of the environment?

The Proponent has designed the Project to minimize both public and environmental impacts. Section 3.0 of the DRI application describes potential Project impacts and also the numerous mitigation measures that will be employed to avoid and minimize potential impacts. The Proponent has selected a cable route that will avoid sensitive marine habitats, has selected installation methods (e.g., HDD, cable burial using an ROV and barge equipped with dynamic positioning system) that will avoid and minimize impacts to coastal and marine resources, and will employ Best Management Practices during the active construction period to prevent erosion or sedimentation and to minimize noise and light from the operation. All of these elements of the Project are described in the DRI application and in previous MEPA submissions, which have also been provided to the Martha's Vineyard Commission.

In addition, wetland area adjacent to the path along Squantum Avenue will be protected by using timber matting to create a path for construction equipment. Using timber matting will also significantly reduce, if not eliminate, the need to remove a row of evergreen trees along the path. In response to concerns from neighbors about using Main Street as an accessway to the site, the Proponent will instead gain access via the right-of-way road off of Golf Club Way.

What provision is being made for restoration of the environment after installation?

A few trees along the western side of Squantum Avenue and a small area of scrub oak at the end of the path may need to be removed to provide sufficient access to the work area. It is expected that these locations will naturally re-vegetate. Based on discussions with the landowner, Sheriff's Meadow Foundation, the Proponent may provide minor plantings in-kind once the Project is complete.

The Proponent proposes to perform a post-construction video survey of the marine cable route approximately four to six weeks after initial installation. This survey will consist of a one-day reconnaissance-level survey consisting of side scan, bathymetry, and video transects over the cable alignment to determine if any visible evidence of the cable trenching or significant disturbance is still present. If any is found, a subsequent survey will be conducted one year later that will consist of the same reconnaissance-level data collection.

3.6 Scenic Values

Streetscape: Up to 15 additional utility poles may be required. The specific sites of these poles are unknown at this time. Depending on the method of access to the drilling site a dirt road section of Main Street could be impacted.

NSTAR plans to rebuild an unused riser station at the location where two other riser stations are located south of Main Street on NSTAR property. The riser station will have two new vertical wooden poles with a cross-arm to transition the underground cable to overhead construction similar to what is done for the two cables already at that location. Along the right-of-way southward (ROW 305), two new poles will be installed.

Correspondence

Public: Elizabeth Buddy has submitted a letter with several concerns. Elizabeth Buddy submitted a second document on 1/18 with many questions.

Elizabeth A. Buddy, 3 Putnam Hill Apt. 3B, Greenwich, CT 06830

1. **The large machinery necessary for this work will have to enter and exit a narrow dirt road ill-suited to such invasive use. The canopy of trees risk damage. Are trees already pegged for removal to make way for the army of poles proposed to line this dirt road?**

   Every effort will be made to avoid removing the row of evergreens along the side of Squantum Avenue. HDD will be utilized to minimize impacts to the vegetation along this path. In addition, as described previously, the use of timber matting will enable site access while avoiding wetlands impacts. No new utility poles will be installed along Squantum Avenue, and the new cables will be installed underground to a point within the existing right-of-way on the south side of Main Street. New electric cable will the proceed down the right-of-way, while the new communications cable will run along Main Street on existing utility poles.

2. **What would be required for maintenance after the initial installation? Experience has shown the Cable TV and Internet often break down. What kind of heavy equipment would be required for repairs, especially for a cable underground?**

   There will be no routine maintenance required for the proposed cable following installation. The likelihood of underground failure is minimal; should the underground

fiber optic fail, Comcast will simply switch to other fibers contained in the same cable bundle. Furthermore, since the submarine cable will not contain splices and will be predominantly buried in the seafloor, it will be much less susceptible to damage from dynamic currents or events such as anchor drops.

If a repair is necessary, then the specific repair methods used will depend on the specific circumstances of the damaging event. Variables significant to the repair methods would include surficial and subsurface characteristics, water depth, tides, currents, burial depth, and the amount of excess cable slack. Nonetheless, if cable damage does occur, the following general procedures would be anticipated:

- The fault will be initially located by testing from the terminal stations. Assuming the cable failure occurs in an exposed section, a repair ship will recover the cable using a variety of "grapnels," special devices that can simultaneously cut and seize cables. Visual identification of the damaged area, performed by divers, may be required prior to recovery, following which the grapnel will be lowered from the repair vessel and traverse the cable line on the seabed.

- After the cable is found and hooked by the grapnel, it will be cut in location and one end will be raised and brought onto the ship.

- A buoy will be attached to the end of the recovered cable, which will then be replaced on the ocean floor. Recovery of the other cable end with the grapnel will then proceed.

- After the other end of the cable is recovered on board and the faulty cable section is removed, replacement cable will be joined in and the cable will be deployed back to the buoy.

- The end of the cable attached to the buoy will be brought aboard and spliced to the replacement cable.

- After a series of tests, the cable will be released and lowered onto the ocean floor.

- Unburied portions of cables can be reburied by divers using water jets, or if large areas become exposed, a cable-trenching ROV or hydroplow could be used for the reburial.

3. **What is the precedent for bringing this kind of cable under environmentally sensitive land?**

It is not uncommon for utility lines to be installed in sensitive areas, and HDD and submarine cable burial are now widely used to avoid and minimize environmental

impacts to sensitive coastal and marine resources. These techniques were also used to install two submarine cables to Nantucket.

4. **Why can't Comcast and NSTAR collaborate to bring in their cables at the other points of entry they already use and which would have no environmental impact?**

   The proposed landing site is already the landing site for two existing NSTAR cables. Furthermore, the proposed installation methodology will result in limited impacts that will be mostly constrained to the construction period. The Project will not result in any permanent impacts to wetland resource areas.