



# Franklin Regional Council of Governments

## STATEMENT FOR FERC NOI SCOPING SESSION (PF14-22)

### KINDER MORGAN TENNESSEE GAS PIPELINE NORTHEAST ENERGY DIRECT PROJECT

July 29, 2015

The Franklin Regional Council of Governments (FRCOG) submits the following initial comments on the proposed Kinder Morgan Tennessee Gas Pipeline (TGP) Northeast Energy Direct (NED) pipeline project (PF14-22). The FRCOG is the Regional Planning Agency for the 26 communities of Franklin County. The FRCOG serves eight communities along the proposed route, as well as abutting communities, that will be impacted by the 34 miles of pipeline and large-scale compressor station proposed for our region. We have actively participated in the FERC process and have also formed a Regional Pipeline Advisory Committee, with representatives from the eight communities along the proposed pipeline route, to provide technical assistance on the FERC process. This is the largest proposed project in Franklin County since the I-91 interstate highway was built.

The FRCOG has significant concerns about the natural and cultural resource impacts of the NED pipeline project. The resources in Franklin County that would be directly impacted by the proposed pipeline include: public and private drinking water supplies, permanently protected open space, farmland, rare and endangered species habitats, public infrastructure, and historic resources. The short and long-term impacts that the proposed project would have on our communities and region are profound.

We request that the FERC thoroughly evaluate the need for this pipeline, which has only 500,000 dekatherms per day under agreement with gas companies. Even with the recently proposed reduction in pipeline size to 30 inches and 1.3 Bcf/day, this pipeline project still has only 38% of its capacity committed. If the larger 36-inch pipeline with a capacity of 2.2 Bcf/day were permitted, only approximately 23% is committed. In the absence of a demonstration of need, FERC lacks authority to approve the project.

We also request that other alternatives to meet electricity generation and natural gas demand in New England be fully explored, including energy conservation, renewable energy production, LNG storage, expansion of existing gas pipelines and improved operational efficiencies by other pipelines that can result in recapture of leaked gas. We also ask that alternative routes be analyzed that could have less impacts on environmental resources. We trust that FERC will include a detailed analysis of these alternatives in the Draft Environmental Impact Statement to be developed and published for public comment.

The FRCOG intends to submit additional, more detailed Study and Information Requests in coordination with other Regional Planning Agencies in Massachusetts and New Hampshire for inclusion in the Environmental Impact Statement before the deadline established by FERC for the Notice of Intent (NOI) Scoping Session comment period. In addition to the alternatives analysis requested above, our Study and Information Requests will focus on the following areas:

- Protection of Water Resources (public & private drinking water supplies, rivers, lakes, ponds & wetlands)
- Protection of Air Quality
- Protection of Public Safety
- Protection of Critical Habitat Areas for Rare & Endangered Species
- Minimizing Noise Impacts
- Mitigating Impacts on Infrastructure including Roads, Bridges, Culverts and Electric Transmission Lines
- Addressing Impacts on Private & Public Property
- Avoiding Impacts on Permanently Protected Open Space
- Avoiding Impacts on Historic and Archeological Resources
- Addressing Economic Development Impacts on Heritage & Recreational Tourism and Natural Resource Based Businesses including Agriculture and Forestry
- Addressing Fiscal Impacts on Towns

The Study and Information Requests that will be submitted are directly related to the general headings listed in the FERC Notice of Intent dated June 30, 2015 (Pages 5-6) for the TGP NED project and will provide the level of information needed for FERC to fully evaluate the environmental, land use and socioeconomic impacts of the proposed project and make an informed decision. Thus far, the information submitted by the company as part of the pre-filing stage has not been sufficiently detailed to allow for meaningful public comment. Thus, it is our hope that by asking for specific studies, FERC will develop a record of decision that includes adequate detail on the proposed pipeline project so that the public can fully understand and comment on the potential impacts.

We respectfully request that after the Scoping Session NOI comment period is closed, that FERC advise us as soon as possible about what information will be included in the Draft Environmental Impact Statement (DEIS). We also request an extension of the NOI comment period from August 31, 2015 to September 30, 2015 to provide additional time for public review of the recently filed Resource Reports by TGP on July 24, 2015 which contain a vast amount of information on the project.

Thank you for this opportunity to provide comments on the development of the Environmental Impact Statement for the proposed Kinder Morgan Tennessee Gas Pipeline NED Project.