



TOWN OF ASHBY

Conservation Commission

895 Main Street
Ashby, Massachusetts 01431

November 22, 2014

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE
Room 1 A
Washington, DC 20426

RE: Tennessee Gas Pipeline Company, L.L.C., Docket No. PF14-22-000
Request to Use Pre-filing Procedures for Proposed Northeast Energy Direct Project

Dear Secretary Bose,

The Ashby Conservation Commission requests that the Federal Energy Regulatory Commission (FERC) consider some of the special aspects of the Town of Ashby in its review of the Tennessee Gas Pipeline Company's (TGP) proposed NED project.

The Town of Ashby has a population of 3,168.^[1] Much of the town's soils consist of a thin layer of glacial till that was plastered down beneath the glacier in a thin veneer over the bedrock.^[2] Except for a few public wells that service the elementary school, library, private pre-school, a private camp ground and a restaurant, the entire town is on private water supplies, almost all of which are wells.

Over the past 20 – 30 years, there have been a few projects in town that have required blasting to construct projects through ledge. Each time, surrounding wells were negatively affected by the blasting. The proposed pipeline route crosses many private properties with exposed and buried ledge.

All waters in Ashby have the designation of Outstanding Water Resource. As such, all require that a 401 Water Quality Certificate be issued before the start of any work that would fill, dredge or alter that water resource. The proposed route of the pipeline crosses many such waterways. The Ashby Conservation Commission is a volunteer board. Whether each of these crossings would require its own Notice of Intent and 401 Water Quality Certification Application or all of these crossings be included in one massive project, processing the project(s) within the DEP time requirements could present a challenge to the all-volunteer Ashby Conservation Commission. We would likely request that the project through Ashby be broken down into manageable chunks and submitted serially rather than all at once. We feel that the cumulative decades-long experience and knowledge of our Commissioners must be respected and included.

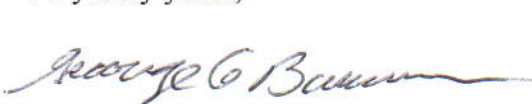
In addition to presenting an administrative nightmare, because all waters in Ashby are Outstanding Resource Waters, work could only be conducted during specific times of the year. Understanding the logistics of managing a project as large as this one, it seems unlikely that Tennessee Gas Pipeline would be able to comply with time and seasonal restraints on work that protection of our waters would require.

As Ashby lies in an area of Massachusetts that has not had its natural resources well documented, and, as noted in its exclusion of much of the town from the Petapawag Area of Critical Environmental Concern, is unlike most other areas of Massachusetts in its topology and natural resources, it would appear imperative to us that Tennessee Gas Pipeline be required to submit an Environmental Impact Study rather than an Environmental Assessment.

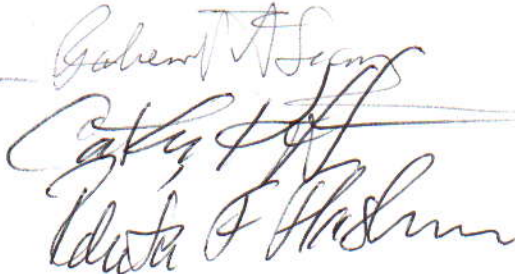
For all of these reasons, the Ashby Conservation Commission would object strongly to any attempt to expedite this project through the FERC Pre-filing Procedures. We believe strongly that this project should not go forward, but in the event that it does, in order for it to proceed with a minimum of permanent damage to the environment of Ashby all aspects of the project must be undertaken with the due diligence and care afforded through the standard review of a project submitted to the Federal Energy Regulatory Commission.

Thank you for your time and consideration.

Very truly yours,



George Bauman, Chair
Robert Leary, Vice Chair
Roberta Flashman, Secretary
Cathy Kristofferson, Treasurer



cc: Governor Deval Patrick
Governor Elect Charles Baker
US Senator Elizabeth Warren
US Senator Edward J. Markey
US Congresswoman Niki Tsongas
State Senator Stephen Brewer
State Senator Elect Anne Gobi
State Representative Sheila Harrington
Maeve Vallely-Bartlett, Secretary of Energy and Environmental Affairs
Matthew Beaton, incoming Secretary of Energy and Environmental Affairs

[1] Town census completed in April, 2014
[2] Ashby Open Space Plan 2004