



December 18, 2014

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

Regarding: Tennessee Gas Pipeline Company, L.L.C., Docket# PF14-22-000

Dear Secretary Bose:

Kestrel Land Trust is dedicated to conserving the land that sustains the quality of life and ecological integrity of the Connecticut River Valley. Kestrel represents over 1,000 conservation minded citizens in the Connecticut River Valley. On behalf of our members and Board of Directors, I submit the following comments:

Kestrel Land Trust opposes Kinder Morgan's Northeast Energy Direct pipeline proposal to cross the western and northern tier of our Commonwealth and now into New Hampshire. There has been no convincing demonstration that New England needs more natural gas pipelines for its residences and businesses. Ecological connectivity does not recognize town or state boundary lines, so merely looking for a different route does not address the threshold question of whether there is a public need for more natural gas transmission lines.

We ask that the Commission carefully and thoroughly attend to the points made and questions raised by Massachusetts Audubon Society in their comments of October 6, 2014 to seek credible data and analysis of need for this project. We understand that the Commonwealth of Massachusetts is engaged in examining whether any pipeline expansion is needed, or whether other measures such as conservation, fixing all leaks in existing pipes, dramatically expanding the availability of improved solar and wind technologies, or market-based solutions and better management of existing lines would solve perceived problems. A meaningful, ongoing public assessment of our energy needs and goals that includes all stakeholders is critical for our future.

We also call upon the Commission to review the policies and processes that allow pipelines to gain approval in a piecemeal, segmented manner rather than through a comprehensive energy plan that considers long-term local and regional goals of sustainability.

Federal and state conservation areas, municipal watershed lands and privately held protected agricultural and forestlands are at risk of intrusion. Construction and disruptive activities on these lands pose an environmental and existential threat to all land trusts. These activities also pose a threat to private landowners and to citizens who have entrusted their properties to legal protections afforded by contracts with land trusts and with state and federal entities. No matter where the pipeline is located, relieving one section of the Commonwealth's forests, parks and protected lands to the detriment of another area still damages the natural resources we depend on — clean air, water, soil and habitable climate.

More alarming than the various proposed routes, is the evidence that this expansion of gas infrastructure simply is not needed, but is being driven by the newly available shale gas from the Marcellus region and the need for gas in foreign markets. This pipeline is being marketed to our region as a way to "move product." Lands which were conserved for the benefit of the public, should not be destroyed for the benefit of overseas consumers. If the proposed pipeline is built into the fabric of our forests, farms and fields, there will come a time when the Marcellus shale fuels will be depleted. At that time, the landowners in the Marcellus region will be left with contaminated soils and underground waters, and our citizens will be left with the toxic refuse of the pipeline, and the extraordinary and unnecessary loss of forest and wetland habitat inflicted on our precious lands by Kinder Morgan.

Moreover, there is convincing and alarming scientific evidence that worldwide climate changes caused by the emission of natural gas, methane and other fossil fuels and greenhouse gases will lead to ever-increasing occurrences of critically destructive extreme weather events, acidified oceans and life-destroying rising seas. As an organization whose very purpose is to protect land for the sake of ecological integrity, we vigorously object to the vast destruction of land and damage to water that is caused by extracting, distributing and burning natural gas as a solution to our long-term energy needs. Unnecessary expansion of natural gas capacity – wherever the pipeline route is proposed – threatens the quality of life that we work to sustain.

Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Jonas".

Robert Jonas, Chairman of the Board

cc: (via email)

Governor Deval Patrick
Governor Elect Baker
EEOA Secretary-designate Beaton)
Congressman James McGovern
EEOA Secretary Maeve Vallye Bartlett
U. S. Senator Elizabeth Warren
U. S. Senator Edward Markey
Attorney General Martha Coakley
Attorney General Elect Maura Healey
State Senator Stanley Rosenberg
State Representative Ellen Story
Richard Hubbard, President, Massachusetts Land Trust Coalition
Jack Clarke, Legislative Director, Massachusetts Audubon Society