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FEDERAL ENERGY
REGULATORY COMMISSION

September 3, 2015

Kimberly D. Bose, Secretary

FERC

888 First Street NE

Washington, DC 20426

RE: Tennessee Gas Pipeline Comp. LLC

DOC# PF14-22-000

Northeast Energy Direct Project

Dear Secretary Bose,

The co-location of this proposed gas pipe line with an existing power line that crossed Berkshire and Franklin Counties sounded like a good idea, especially if it was placed within the current cleared easement. But I quickly learned that the gas pipe line easement would not be within the power line easement but outside and requiring a new easement. Furthermore after walking and viewing much of the power line route between the MA/NY and MA/NH state lines I soon realized this is not a responsible route for a gas pipe line for the following reasons. But first, I will give you some background information on my credentials. I was a professional forester for 40 plus years, working in forested mountain terrain and familiar with logging operations in Franklin County. We operated under strict management practices to prevent erosion and not allowed to skid logs on steep mountain slopes. The reasons for not using the proposed co-location route are the following.

- 1) The power line chosen for this co-location easily crosses the mountainous terrain of Berkshire and Franklin County. All rivers, highways, railroads, gorges, wetlands, reservoirs, and steep mountain slopes are easily spanned with little ground disturbance following tree removal. A pipeline following this same route is a major land disturbance when a 6' by 8' trench is dug or blasted in the ground.
- 2) Soon after entering Hancock, Massachusetts the proposed route encounters Potter Mountain (Jiminy Peak) which is part of the Pittsfield State Forest (Article 97 land) designated a Forest Reserve. The proposed pipe line enters the State Forest at a tributary to Kinderhook Stream and then ascends steeply up Potter Mountain on 60% slopes and near vertical at the top. The line then descends steeply down the east slope crossing three tributaries of Hollow Brook. Digging and blasting a trench straight up and down these steep slopes cannot be done without uncontrolled erosion, which would clog all tributaries crossed. Massachusetts Department of Environmental Quality would have to suspend their erosion control regulations for this pipe line to be constructed. And these steep mountain slopes are only one of many to cross in Berkshire

and Franklin County. For example, across from Potter Mountain to the east is North Mountain where the power line climbs 1000' in elevation through the Chalet State Wildlife Management Area also Article 97 lands. After crossing Route 9 this power line crosses through rough steep forest that comprises the Pittsfield Watershed, also Article 97 lands and passes between Windsor Reservoir and Cleveland Brook Reservoir and over a connecting aqueduct. This is not a suitable area to dig and blast a trench.

- 3) Throughout this mountainous terrain access roads will be needed on both private and public lands. These roads will require upgrading to allow large construction equipment and pipe line supplies. Tree cutting and road rebuilding will be required sometimes not agreeable to the owners. The extent and location of these access roads are not known.
- 4) In Dalton, MA and perhaps other towns the power line easement has only been partially cleared. In this town the proposed gas pipe line is located on the uncleared side of the power line easement. This means an uncleared strip of trees will be left between the pipe line clearing and the power line clearing and likely cause wind throw of the trees in this strip.

In conclusion, this proposed route is not a responsible location for a pipe line, unless the proponents care little for our forest, soils, and water resources of the Commonwealth of Massachusetts.

Sincerely,


Bruce Spencer

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