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GOVERNOR

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August 25, 2015

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

RE: Northeast Energy Direct Project, Tennessee Gas Pipeline Company, L.L.C.  
Docket No. PF14-22-000

Dear Ms. Bose:

Thank you for the opportunity to provide comment on the Northeast Energy Direct Project (Docket #PF14-22). The Conservation Land Stewardship Program, on behalf of the Council on Resources and Development (CORD), is responsible for monitoring and oversight of conservation land interests that were acquired through the State of New Hampshire's Land Conservation Investment Program (LCIP). Between 1988 and 1993, the State of New Hampshire through this program invested almost \$50 million to protect approximately 100,000 acres of land, including some of the most pristine lands in the state.

The current NED proposal crosses six parcels of land that were protected through the LCIP in the towns of Amherst, Mason, Troy, and Richmond. These properties are shown on the attached maps. It is important to understand that lands and interests in lands that were acquired through this program are held in public trust and that State law specifies that the sale, transfer, conveyance, or release of any such land or interest in land from the public trust is prohibited absent legislative action by the New Hampshire General Court.

We understand that Kinder Morgan (KM) may be working to develop alternatives that would avoid impacts to one of these parcels in the Town of Amherst. We would respectfully request that alternative analyses be performed to avoid and minimize impacts to the other lands protected through the LCIP, as well as to avoid all protected conservation lands in New Hampshire (including both those protected in-fee and through conservation easements). The State of New Hampshire, municipalities, non-profit land trust organizations, and residents of the state have invested immeasurable time, effort, and money into legally and permanently protecting many of the State's most important environmentally sensitive resources, forests, agricultural lands, recreation lands, and other open spaces. It is critically important that potential impacts to these already protected lands be taken seriously and that the alternatives analysis be thorough, rigorous, and transparent.

We would request that information submitted by KM and included in the Draft Environmental Impact Statement (EIS) clearly depict all protected conservation lands in New Hampshire. It is not clear based on the information submitted by KM to date that all protected conservation lands in New Hampshire are included. We would also request that both the Environmental Resource Reports (ERR) developed by KM and the draft EIS clearly show the location of protected conservation lands in relation to all impacts that are being proposed. The boundaries of protected conservation lands should be shown on ERR detailed alignment sheets and any other detail maps where impacts (both temporary and permanent) are proposed

on or adjacent to conservation lands. Without this information, it is not possible to properly quantify or evaluate the potential impacts resulting from the project to conserved lands or important resources on those lands, or to assess alternatives that could avoid these protected lands or other important resources.

Finally, we would ask that FERC, as part of its draft EIS, evaluate the need for this particular project in the context of all other projects that are being considered in the region, and whether those projects could provide the necessary capacity with less impact to protected conservation lands and important environmental natural resources.

Thank you for considering these comments.

Sincerely,

A handwritten signature in cursive script that reads "Tracey Boisvert".

Tracey L. Boisvert, Program Director  
Conservation Land Stewardship Program

Enclosure: 3 Maps

# Conservation Property Acquired through LCIP Impacted by Northeast Energy Direct Project Town of Amherst, NH

Scale in Miles  
0.005 0.01 0.02 0.03 0.04 0.05



- NED Project Proposed Main Line
- Scott LCIP Town Property
- Other Nearby Conservation Land



Conservation Property Acquired through LCIP  
(aka Scott Parcel)  
Fee-Owner - Town of Amherst

# Conservation Properties Acquired through LCIP Impacted by Northeast Energy Direct Project Town of Mason, NH

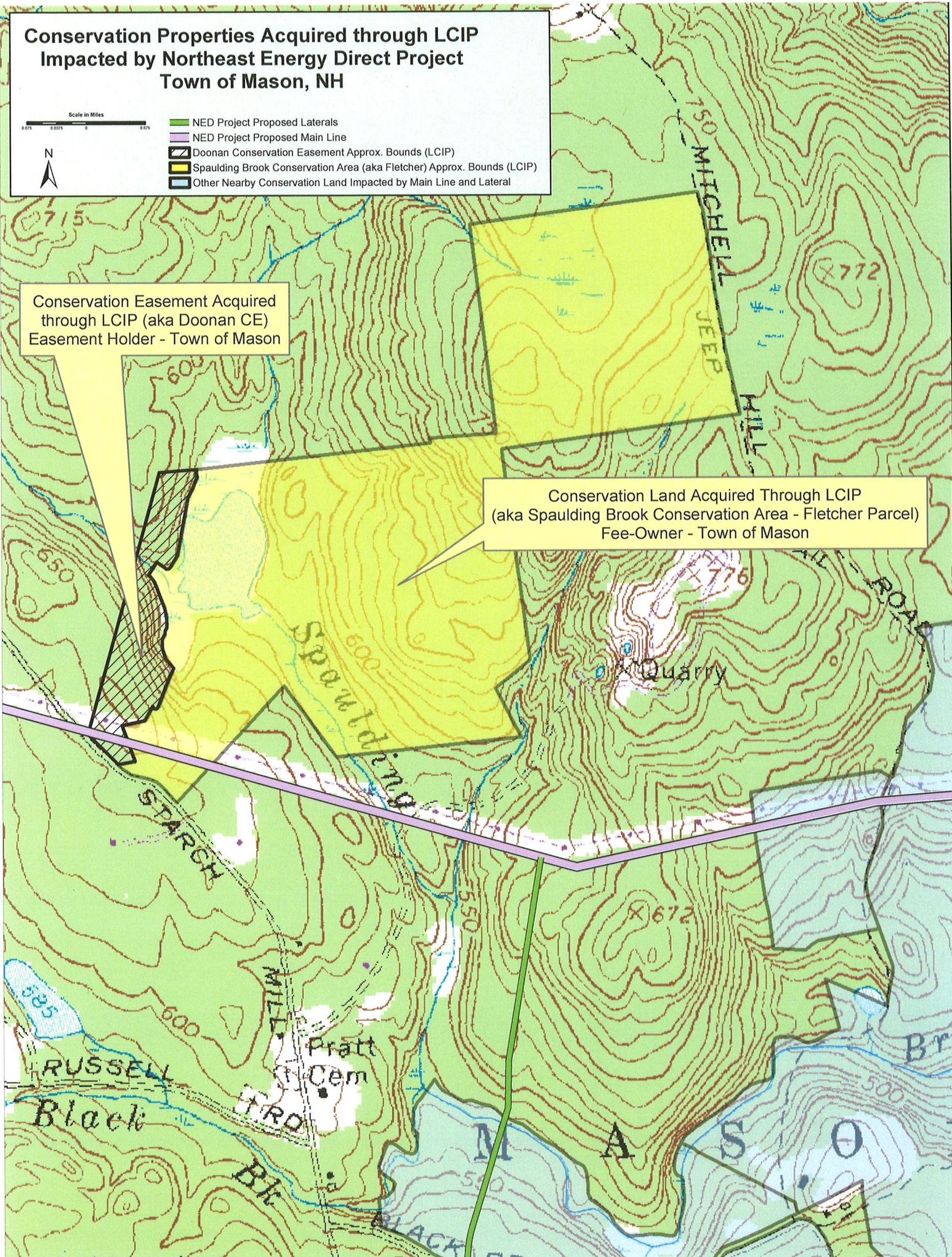
Scale in Miles  
0.000 0.005 0.010



- NED Project Proposed Laterals
- NED Project Proposed Main Line
- Doonan Conservation Easement Approx. Bounds (LCIP)
- Spaulding Brook Conservation Area (aka Fletcher) Approx. Bounds (LCIP)
- Other Nearby Conservation Land Impacted by Main Line and Lateral

Conservation Easement Acquired through LCIP (aka Doonan CE)  
Easement Holder - Town of Mason

Conservation Land Acquired Through LCIP  
(aka Spaulding Brook Conservation Area - Fletcher Parcel)  
Fee-Owner - Town of Mason



# Conservation Properties Acquired through LCIP Impacted by Northeast Energy Direct Project Towns of Richmond & Troy, NH

-  NED Project Proposed Main Line
-  State-Held LCIP Cons. Easements (Treegrowers) - approx. bound
-  State Owned LCIP Land (Kirschner) - approx. bound
-  Other Surrounding Conservation Lands

Conservation Easement acquired through LCIP (aka Tree Growers CE #1) (adjacent to Rhododendron State Park) Easement Holder - State of New Hampshire

Conservation Easement acquired through LCIP (aka Tree Growers CE #2) (adjacent to Rhododendron State Park) Easement Holder - State of New Hampshire

Conservation Property acquired through LCIP (aka Kirschner Parcel) Property Owner - State of New Hampshire (managed by DRED as part of Rhododendron State Park)

