



October 30, 2015

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

Re: Tennessee Gas Pipeline Company, L.L.C. ("TGP") Docket No. PF14-22-000: Proposed Northeast Energy Direct ("NED")

Dear Ms. Bose:

On Wednesday, September 16, 2015, the Town of Amherst Pipeline Taskforce held a meeting with representatives of the Tennessee Gas Pipeline Company / Kinder Morgan to discuss the alternative options for the pipeline route through Amherst currently under analysis by Kinder Morgan. This served as a follow up to two earlier meetings during which sensitive areas were identified by the Amherst Pipeline Taskforce as priority areas to be avoided.

In subsequent weeks, the Town has evaluated the direct impacts of the September 16, 2015 proposed route in comparison with the alternative route proposed in the December 2014 pre-filing. Attached please find a memorandum prepared for our Board of Selectmen providing a preliminary summary analysis of the impacts of the originally proposed and the revised alternate routes within the Town of Amherst.

I respectfully ask that this letter and the accompanying memorandum be included as part of the public record.

Thank you for your consideration of this information.

Sincerely

James M. O'Mara, Jr. Town Administrator

Cc:

Website File w/ attachments

JOM/cpm



Town of Amherst, New Hampshire Office of Community Development

 $Building \cdot Code \ Enforcement \cdot Planning \cdot Zoning \cdot Economic \ Development$

TO:	Board of Selectmen Jim O'Mara, Town Administrator
FROM:	Colleen Mailloux, Community Development Director
RE:	Northeast Energy Direct Pipeline – Preliminary Analysis – KM Alternate Route through Amherst versus Original Proposed Route
DATE:	October 22, 2015

As the Board of Selectmen is aware, the original route for the proposed NED pipeline through Amherst severely impacted homeowners and sensitive environmental areas. The ACC's Preliminary Environmental Assessment described the environmental risks in some detail, and formed the basis for the Board's first letter to the FERC in March of 2014. In addition to environmental impacts, the original route, while roughly paralleling the Eversource Transmission lines, cut through numerous residential properties, crossed cul-de-sacs, and included two potentially disruptive Horizontal Directional Drills (HDDs) in order for the pipeline to cross under the Souhegan River in four separate locations.

During its initial meetings, the volunteer Amherst Pipeline Task Force identified and pursued multiple strategies to respond to the proposed project. One of the approaches undertaken by the Task Force was to identify densely populated residential neighborhoods and sensitive environmental areas to be avoided. To that end, the Task Force developed a set of criteria and recommended that Kinder Morgan consider alternate routes that would avoid workforce and senior housing developments, schools, residential cul-de-sacs, threatened and endangered species habitat, the Souhegan River, Ponemah Bog, and land held in conservation easements.

These "avoidance areas" were presented to Kinder Morgan representatives at a meeting in April of this year. At a subsequent meeting in June, Kinder Morgan presented an alternate route that addressed some of the issues identified. On September 16, 2015, Kinder Morgan presented a revised alternate route to the Task Force and indicated that this revised alternate route would be what was proposed when the NED Pipeline application was filed with the FERC, currently expected in November, 2015.

At the request of Vice Chairman D'Angelo, I have prepared the attached preliminary summary table identifying the impact of the originally proposed route through Amherst and the currently proposed alternative Route. The impacted properties identified are only those directly impacted by a proposed route located on their property.

From the preliminary analysis, it appears that the revised alternate route identified in September 2015 substantially avoids the areas of concern identified by Pipeline Task Force. While the proposed route still impacts 6 residential properties (2 of which are undeveloped) in the Town of Amherst, it avoids impacts to significant environmental resources and sensitive populations and reduces the overall length of the route in Amherst by over 1 mile.

While the Amherst Pipeline Taskforce and Town of Amherst <u>do not</u> endorse the NED pipeline project, the September 2015 revised proposed route appears to significantly reduce the potential impacts in our community.

As the FERC and NHSEC review processes commence, the Town of Amherst and the Pipeline Task Force will continue to work to ensure that appropriate construction methods and impact mitigation are incorporated into any project proposals.

	Original Route (12/8/2014)	Alternate Route (9/16/2015)
Total Length of Pipeline in Amherst	4.1 miles	2.8 miles
Total Number Impacted Properties	45	24
Total Impacted Residential Zone Properties	37 (8 undeveloped)	6 (2 undeveloped)
Total Impacted Commercial / Industrial Properties	5 (2 undeveloped)	18 (7 undeveloped)
Total Impacted Conserved Properties	3 (Scott Conservation Land- 2 parcels, Ponemah Bog/NH Audubon Society)	0
Other Impact Areas of Note	Souhegan River Lot 1-13 (Workforce Housing Development) Amherst Christian Church Bon Terrain Water Tower	