



United States Department of the Interior

NATIONAL PARK SERVICE
Northeast Region
United States Custom House
200 Chestnut Street
Philadelphia, PA 19106

IN REPLY REFER TO:

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October 22, 2015

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

Subject: FERC Docket PF14-22-000 – Notice of Intent to Prepare an Environmental Impact Statement for the Planned Northeast Energy Direct Project (Tennessee Gas Pipeline Company, L.L.C.); in Pennsylvania, New York, Massachusetts, New Hampshire and Connecticut; NPS (ER 15/0370)

Dear Secretary Bose:

The National Park Service (NPS) is pleased to provide additional comments on the Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) for the Northeast Energy Direct Project (NED). NED would involve the construction and operation of natural gas facilities by Tennessee Gas Pipeline Company, L.L.C. (TGP), in Pennsylvania, New York, Massachusetts, New Hampshire and Connecticut. The NED Project would consist of the construction and operation of approximately 412 miles of new natural gas transmission pipeline and associated facilities, including modifications at existing compressor and meter stations, and construction of nine new compressor stations, fourteen new meter stations, and various appurtenant facilities. These facilities would be capable of providing 2.2 billion cubic feet per day of capacity to transport natural gas to markets in the northeastern United States and Canada. The pipeline includes supply path and market path components. NED also includes construction of nine pipeline laterals, loops or delivery lines in Massachusetts, Connecticut and New Hampshire to provide natural gas to local markets. This second set of comments submitted by NPS address potential impacts of the proposed project on the New England National Scenic Trail.

I. The New England National Scenic Trail

The New England National Scenic Trail (NET) is a 215-mile hiking trail route that has been in existence for over half a century. The NET travels through 40 communities in Connecticut and

Massachusetts, and is comprised primarily of the historic Mattabesett, Metacomet, and Monadnock (M-M-M) Trail systems.

The National Park Service manages the New England National Scenic Trail in accordance with the *Trail Management Blueprint* described in the ‘Metacomet Monadnock Mattabesett Trail System National Scenic Trail Feasibility Study and Environmental Assessment’, (Spring 2006) and referenced in the Omnibus Public Land Management Act of 2009 (Public Law 111-11 Subtitle C Section 5210-02). Consistent with the *Trail Management Blueprint*, NPS administers the New England National Scenic Trail’s planning, acquisition, protection, operation, development, and maintenance through a partnership-based management framework with the two primary trail partners, the Appalachian Mountain Club and Connecticut Forest and Park Association.

Since the federal designation in 2009, there have been some noteworthy changes to the historic route, including a 15-mile extension to Long Island Sound in Connecticut and a 22 mile eastward deviation from the historic Metacomet-Monadnock Trail in Massachusetts.

The NET experience celebrates classic New England landscape features: long-distance vistas with rural towns as a backdrop, agrarian lands, large unfragmented forests, and scenic river valleys. The trail also connects with colonial historical landmarks and highlights a range of diverse ecosystems and natural resources: mountain ridges and summits, forested glades, wetlands and vernal pools, lakes, streams and waterfalls.

Of note to the proposed NED project is the NET’s Richardson-Zlogar Cabin in the project area, near the proposed Market Path Mid Station 3 compressor station. See Figure 1. Located on NET Section 17 in Northfield Massachusetts, the Richardson-Zlogar Cabin offers unparalleled views of Mt. Ascutney, Mt. Monadnock and Mt. Wachusett. Designed for year-round use, the Cabin provides space for up to sixteen and is supplemented by two tent platforms. In 2011, NET landowners and trail maintainers Sam and Barbara Richardson donated a Conservation Restriction to the Town of Northfield on a 38-acre lot on Stratton Mountain. The cabin components were purchased by the National Park Service and built by Appalachian Mountain Club-Berkshire Chapter volunteers in the Fall of 2011 and the Spring of 2012, whose combined efforts contributed over 1,000 hours of work.

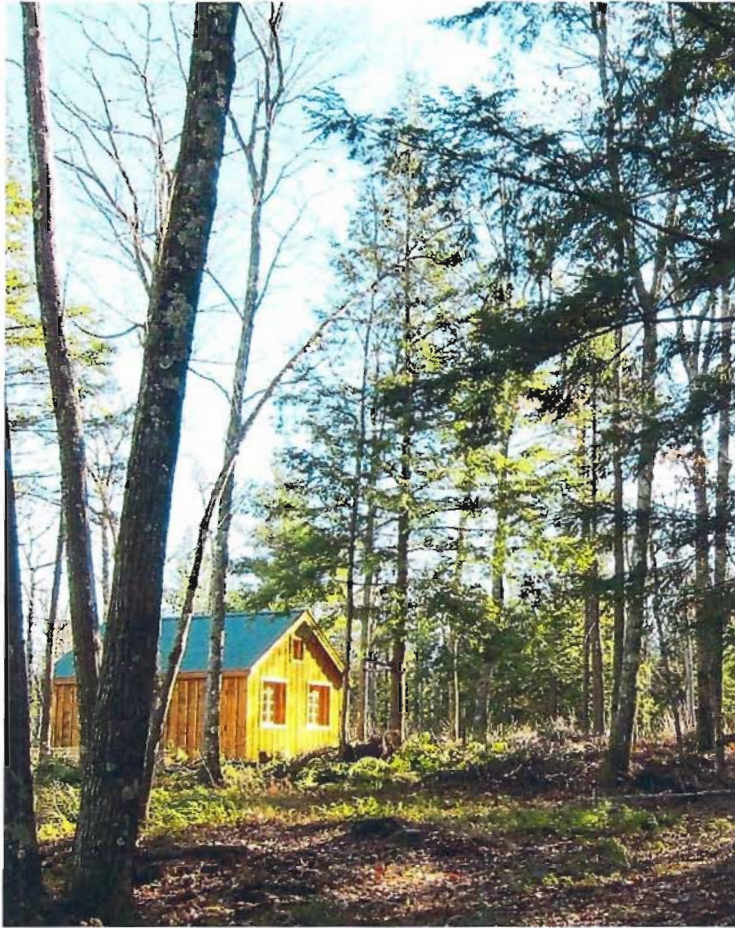


Figure 1: Richardson-Zlogar Cabin on the New England National Scenic Trail in the vicinity of the Proposed NED Market Path Mid Station 3 compressor station.

II. Potential Impacts

NPS has concerns regarding potential impacts to the NET, and the thousands of trail users, from the proposed NED pipeline and associated infrastructure. The NED pipeline proposes to cross the NET seven times over the course of the pipeline route by NPS estimations from the NED project maps available. See Figure 2, Massachusetts; Figure 3, Northern Connecticut; and Figure 4, Southern Connecticut below. These crossings would be disruptive to trail users in the short and long term as detailed below. Of particular concern are the impacts to trail users from the Market Path Mid Station 3 compressor station, located approximately $\frac{3}{4}$ of a mile from the Richardson-Zlogar Cabin.

Trail Crossings and the User Experience

As noted, NPS estimates there would be seven crossings of the NET over the course of the proposed pipeline route in MA and CT. This is a large number of crossings over a relatively

short distance and would likely result in adverse impacts to Trail users during both the construction and operations phases. In the short term, pipeline construction would present safety hazards to trail users, could require reroutes adding considerable distance to their hikes, and would disrupt the sights and sounds they expect to enjoy while hiking. In the longer term the hiking experience would be altered: the visual landscape trail users enjoy could be degraded by the open corridors created by the maintained rights-of-way (ROW), and could encourage illegal use by motorized vehicles utilizing the pipeline corridor to gain access to the NET, thereby increasing health and safety issues for hikers. Operations phase impacts to trail users could include decreased air quality, increased noise, and negative night sky impacts from nearby pipeline infrastructure. NPS recommends all of these impacts to NET trail users be analyzed and disclosed in the environmental impact statement (EIS) prepared for the proposed NED pipeline.

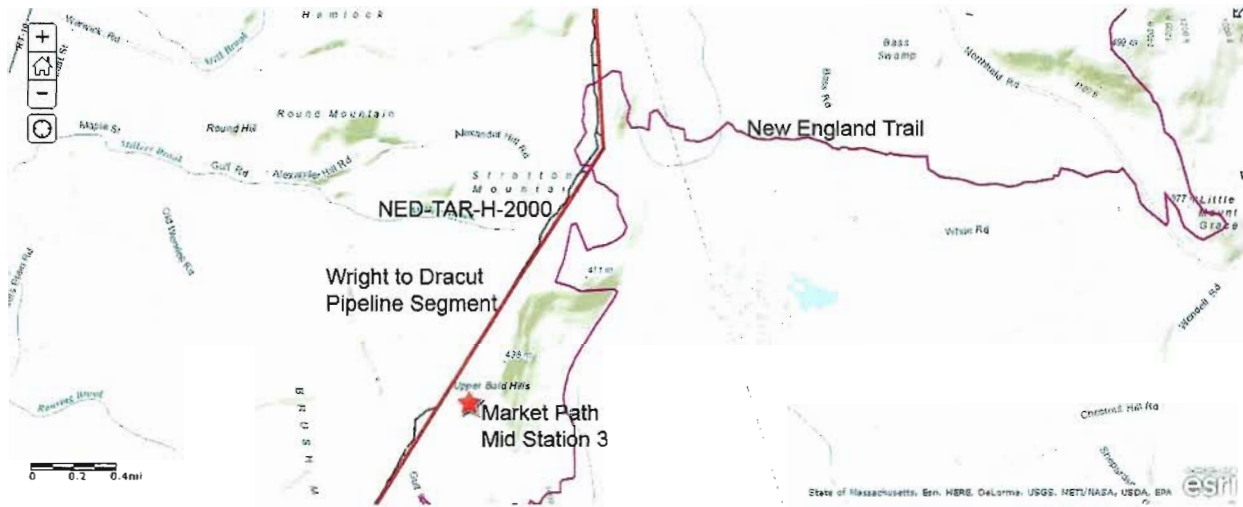


Figure 2: The proposed NED pipeline crossings of the New England National Scenic Trail in Massachusetts.



Figure 3: The proposed NED pipeline crossings of the New England National Scenic Trail in northern Connecticut.



Figure 4: The proposed NED pipeline crossings of the New England National Scenic Trail in southern Connecticut.

Pipeline Infrastructure Impacts on the Trail User

The Market Path Mid Station 3 compressor station has the potential to adversely impact NET trail users. The location of additional proposed infrastructure (valve control units, pig launchers and receivers, etc.) should be disclosed so the effects of these units on the NET trail user can be understood. Specific resource concerns include air quality, noise, night sky, and health and safety impacts to the trail user.

Air

The air quality trail users enjoy could be negatively impacted by the construction and operation of the Market Path Mid Station 3 compressor station. In its Resource Report 9 on air and noise, TGP identified federal and state air quality permitting requirements for the nine new and one modified compressor stations proposed for the Northeast Energy Direct Project. There is no emission data for the compressor station at this time; the DEIS should include these emission levels. Report 9 includes air quality analysis of proposed or modified compressor and metering stations, and a variety of modeling analyzes to be completed. These modeling analyses will be required by state air quality requirements; NPS is not requesting any additional modeling work to be conducted. The DEIS analysis should specifically address air quality impacts to Trail users, including those staying at the Richardson-Zlogar Cabin. NPS will review the modeling results as they are completed and released, in addition to proposed mitigation measures.

Noise

Compressor stations, and assorted pipeline infrastructure such as valve control units, pig launchers and receivers, etc. all add noise to the surrounding environment. Trail users use the NET for the nature-based visual and auditory environment it provides. Pipeline infrastructure has the potential to significantly degrade that environment. NPS manages sounds and noise to restore and maintain natural conditions wherever possible. The DEIS should analyze the impacts pipeline infrastructure may have on the noise the NET trail user experiences. NPS is particularly concerned with the noise impacts to trail users staying at the Richardson-Zlogar Cabin, due to its proximity to the proposed Market Path Mid Station 3 compressor station. The Cabin and the compressor station would be located 3/4 mile apart.

Assessing Impacts to the Acoustic Environment

Resource Report 9 on noise focuses the analysis on regulatory thresholds designed to protect humans in residential areas from negative effects of noise. Full environmental analysis of noise would examine a suite of metrics which are appropriate for the array for resources impacted. Other considerations could examine whether existing sound levels exceed certain decibel (dBA) values that relate to human health and speech. At 35 dBA, human and wildlife sleep can be interrupted [4], [2]. The World Health Organization recommends that noise levels inside bedrooms remain below 45 dBA [3]. At 52 dBA, a listener wouldn't clearly hear another person speaking in a raised voice at 10 meters. [1] All of these resources may help to more fully analyze the impacts of pipeline infrastructure on trail users and overnight guests at the Cabin.

The NPS recommends that the DEIS include an acoustic analysis that:

- Includes the NET environment as areas that can potentially be affected by noise
- Uses appropriate metrics to assess potential environmental impacts
- Determines the natural ambient acoustic condition that exists at the Trail and Cabin
- Assesses the effects from the cumulative noise output of all of the equipment on site (compressor, fans, lube oil coolers, utilities, etc.) under full operating conditions
- Determines the distance at which noise from construction, operation, and maintenance of the compressor will attenuate to natural ambient levels

- Calculates noise levels in the area of the Trail in which the noise associated with the compressor station would be above natural ambient levels.
- Assesses the effects that these noise levels would have on trail users, particularly overnight visitors.

NPS can provide technical assistance and guidance on conducting this type of analysis.

Noise Mitigation

NPS recommends measures are taken to mitigate noise impacts. These can include:

- an acoustically designed compressor building;
- high performance turbine exhaust and air inlet systems;
- low noise turbine lube oil coolers;
- unit blowdown silencers.

Night Skies

Trail users, particularly those who stay overnight on the trail, value the dark night skies the NET provides. NPS works to protect natural lightscapes and prevent the loss of dark conditions and of natural night skies. Pipeline infrastructure could degrade that experience for the trail user. The DEIS should analyze the impact of these potential effects. The analysis should include a lighting plan and specific measures that would be taken to mitigate impacts to the naturally dark conditions near the Trail and Cabin.

The NPS recommends the EIS analyze and consider incorporation of the following general lighting principles.

- Light only where needed
- Light only when needed
- Shield lights and direct them downward
- Select lamps with warmer colors (avoid blue-white)
- Use the minimum amount of light necessary
- Select the most efficient lamp and fixture

Health and Safety

The areas around compressor stations sometimes have to be evacuated for safety reasons. Explicit safety planning to make sure visitors staying at the Richardson-Zlogar Cabin are contacted and transported from the area in such an event must be included in an overall safety plan. At this stage of the project, the DEIS should analyze the impacts of ensuring contact and providing transportation out of the area to trail users who will by their nature be on foot.

III. Conclusion

NPS would be interested in meeting with FERC and the project proponent to discuss the overall project, the NET crossings, pipeline infrastructure and ways to reduce or eliminate impacts.

The NPS, New England National Scenic Trail representative and lead contact is Charles Tracy, Superintendent, at charles_tracy@nps.gov or (617) 223-5210.

We appreciate efforts to consider and address NPS concerns regarding the proposed pipeline. While this, and our previously submitted comment letter, together address a large number of NPS units and program lands, it is important to note that this list might not be complete, and it is the applicant's responsibility to verify the information and ensure that all resources are taken into account. Thank you for the opportunity to provide comments. If you have any questions or need additional information, please contact Mary Krueger, Energy Specialist for the Northeast Region at [Mary C Krueger@nps.gov](mailto:Mary_C_Krueger@nps.gov) or 617-223-5066.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank R. Hays". The signature is written in a cursive, flowing style.

Frank R. Hays, Associate Regional Director
Resource Stewardship and Science, Northeast Region

References

1. Environmental Protection Agency (EPA). 1974. Information on Levels of Noise Requisite to Protect the Public Health and Welfare with an Adequate Margin of Safety.
2. Federal Interagency Committee on Aviation Noise (FICAN). 1997. Effects of Aviation Noise on Awakenings from Sleep
3. Berglund, B., Lindvall, T., Schwela, D.H. (Eds.). 1999. Guidelines for Community Noise. World Health Organization, Geneva.
4. Haralabidis Alexandros S.,et. al. 2008. “Acute effects of night-time noise exposure on blood pressure in populations living near airports” European Heart Journal Advance Access published online on February 12, 2008