

The Honorably Garrett J. Bradley  
Room 479  
State House  
Boston, MA 02133

September 8, 2015

Dear Representative Bradley,

Our organizations are writing in strong opposition to **H.3690 *An Act relative to the conveyance of an easement in the town of Sandisfield, Massachusetts***, which would convey valuable conservation land to Tennessee Gas Pipeline (TGP) for the purpose of constructing natural gas pipelines as part of the Connecticut Expansion Project (CEP).

Protecting open space is critical to sustaining a healthy Commonwealth; our conserved land provides a 400 percent return on investment<sup>[1]</sup> and drives our \$30 billion tourism economy. As the third most densely populated state in the nation, Massachusetts has undertaken decades of careful planning and land conservation in order to protect and preserve our state's valuable landscape.

Our collective organizations represent thousands of citizens across the Commonwealth with a vested interest in protecting the environment, many with concerns about the impacts of this and other pipeline projects in the Commonwealth. We will monitor and oppose **H.3690** and any other legislation related to conveyances of conservation land for pipeline construction if significant environmental conflicts or uncertainties exist within the scope of the proposed project; further **Mass Audubon and ELM will include these votes in our scorecards and other analyses of the 2015-2016 legislative session.**

We oppose H.3690 for the following reasons:

- This project as proposed would not increase natural gas supply or address reliability concerns for Massachusetts residents because according to TGP, utilities in Connecticut have already signed long term agreements for the additional capacity that the CEP would add to the system.
  - In fact, the Massachusetts Attorney General has called for a regional gas capacity study to evaluate the need for additional gas capacity and how new natural gas capacity would affect our ability to meet mandatory greenhouse gas reduction goals put in place by the Legislature through the 2008 *Massachusetts Global Warming Solutions Act* (GWSA, Chapter 298 of the Acts of 2008). This study will “examine options to address electricity reliability needs in New England region through 2030, evaluate costs and benefits of all available energy resource options” and is to be completed by October, 2015. The Attorney General’s study will also investigate other ways to meet energy needs, including energy efficiency and renewable energy generation as well as updating existing infrastructure.

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[1]

- As you know, the GWSA established a framework for reducing heat-trapping emissions to levels that scientists believe provide a decent chance of avoiding the worst effects of global warming. Natural gas is in large part methane. Although the combustion of natural gas causes significantly less greenhouse gas emissions than the combustion of coal or oil, methane itself is a much more potent greenhouse gas and leaks are well documented. A recent report documented 20,000 natural gas leaks from our aging pipes in Massachusetts alone, many over 20 years old<sup>[2]</sup>. A recent study by researchers at Purdue and Cornell Universities showed that leaks in the natural gas supply chain are significantly greater than originally estimated<sup>[3]</sup>. The Environmental Protection Agency has recognized this threat and has proposed new rules to reduce these leaks. The Federal Council on Environmental Quality has issued draft guidelines for National Environmental Policy Act review that require that potential greenhouse gas emissions and climate change impacts of projects be evaluated<sup>[4]</sup>.
- Massachusetts has been a leader in state efforts to address greenhouse gas emissions, including the GWSA, participation in the Regional Greenhouse Gas Initiative and according to the American Council for an Energy-Efficient Economy, leading the nation on energy efficiency efforts<sup>[5]</sup>. We don't want to go backwards. In addition to direct natural resource impact concerns, which is discussed further below, a significant expansion of natural gas/fossil fuel infrastructure and its contribution to new greenhouse gas emissions is not in the best interests or public benefit of the Commonwealth.
- The CEP would result in significant, long-term damage to highly valuable and unique conservation land which includes a variety of habitats, diverse native plant and animal species, historic mill sites, old forests, and river frontage. No mitigation efforts can fully restore pristine, complex natural systems such as wetlands, which provide valuable services such as drinking water purification and flood water protection.
- This project will undermine substantial taxpayer investment in land acquired in 2007 by the Department of Conservation and Recreation as part of one of the most significant land protection acquisitions in the state. This project would result in permanent losses and degradation to existing parkland and adjoining lands with no indication that land of similar natural or cultural characteristics is available nearby thereby making it difficult, if not impossible, to meet the state's established goal of a goal of no-net loss of conservation land. The proposed pipeline would permanently degrade a section of what amounts to more than 8,500 acres of interconnected protected open space which in addition to its high conservation value, offers significant recreational opportunities including hiking, canoeing, kayaking, snowmobiling, cross-country skiing, fishing, and hunting.

<sup>[2]</sup> <https://www.bostonglobe.com/metro/2015/08/20/new-law-casts-light-state-natural-gas-leaks/qJJPCjRZITc5ai0JeHNOqO/story.html>

<sup>[3]</sup> <http://www.pnas.org/content/111/17/6237.abstract>

<sup>[4]</sup> <https://www.whitehouse.gov/administration/eop/ceq/initiatives/nepa/ghg-guidance>

<sup>[5]</sup> <http://aceee.org/state-policy/scorecard>

Thank you for your attention to this matter; **we oppose H.3690 and urge you to withdraw this bill.** Public conservation land should not be used to underwrite private energy projects of questionable need.

Please contact Karen Heymann, [kheyman@massaudubon.org](mailto:kheyman@massaudubon.org), Jen Ryan, [jryan@ttor.org](mailto:jryan@ttor.org), or Nancy Goodman, [ngoodman@environmentalleague.org](mailto:ngoodman@environmentalleague.org), if we can be of further assistance.

Sincerely, Karen Heymann, Legislative Director  
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