



GROTON-DUNSTABLE REGIONAL SCHOOL DISTRICT

P.O. Box 729 • Groton, MA 01450-0729 • Tel.: 978.448.5505 • Fax: 978.448.9402

Alison Manugian
School Committee Chair

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2014 NOV 10 P 4: 08

FEDERAL ENERGY
REGULATORY COMMISSION

ORIGINAL

November 5, 2014

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

PF14-22

Re: Tennessee Gas route crossing Public Land of Groton Dunstable Regional School District

Dear Ms. Bose:

We are writing in reference to Docket Number PF14-22-000. The request to implement pre-filing was submitted by Tennessee Gas Pipeline Company, LLC. on September 15, 2014. The proposed project, referred to as the NED (Northeast Energy Direct) project is currently a 36" diameter natural gas transmission line running from New York State to Dracut, Massachusetts.

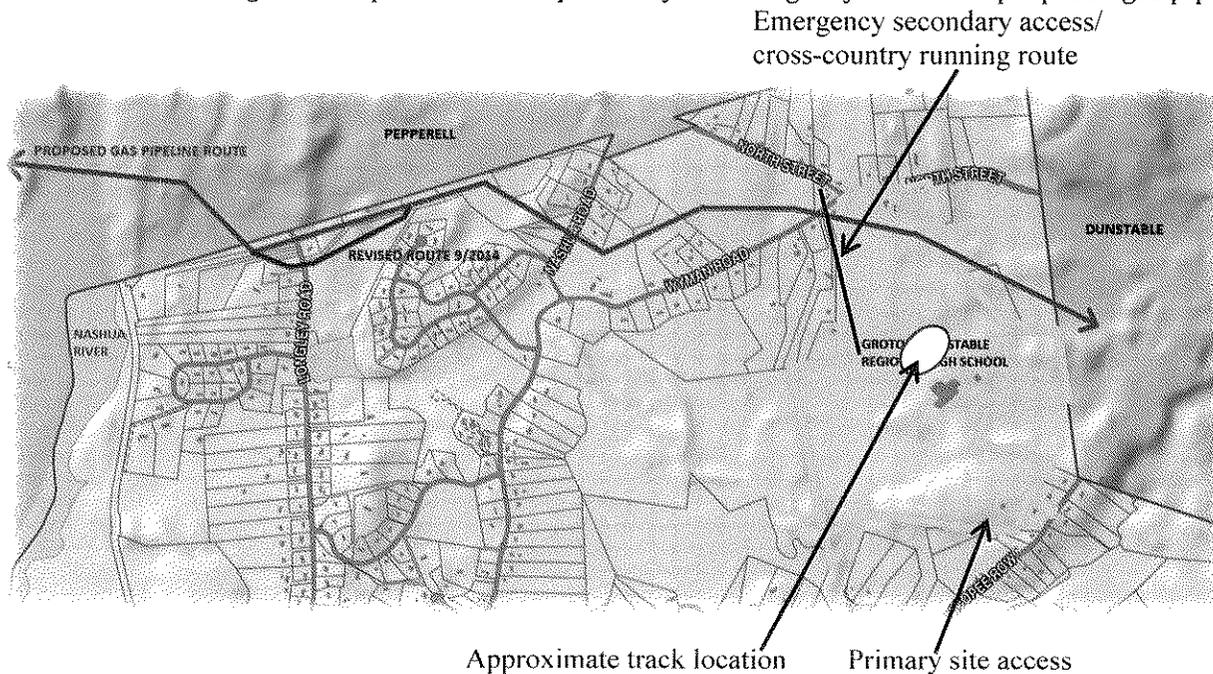
In their request to FERC to use the pre-filing procedures the Tennessee Gas Pipeline Company references (Page 6 item number 3) that this process will "provide early receipt of stakeholder and participating agency input..." and asserts that "early identification and consideration of issues will result in the most expedient processing..." We find this to be tremendously comforting as our perception to date is that Tennessee Gas has been unresponsive when concerns are raised by impacted parties. We are further heartened to see that page one of FERC's Blanket Certificate Program Citizens' Guide specifically states "Projects that could significantly affect rates, services, safety, security, competing gas companies or their customers, or the environment are not eligible for the blanket certificate program." Certainly a project, utilizing 175 miles of greenfield sites, in a state where an existing easement and pipeline are in service, can not be eligible for the blanket certificate program.

While we share many of the concerns raised by others in our communities our specific concerns relate to 703 Chicopee Row (Book 11849, page 100), which is directly on the proposed pipeline path. Please see the sketch of the property on page two of this letter. The land and buildings constructed there are owned by the Groton Dunstable Regional School District and hence are public property. The parcel is home to our High School campus (completed in 2003) and is permitted for an additional school building should our enrollment demand additional facilities.

A Regional School District in Massachusetts functions as an entity legally independent from the municipalities it serves. The duties and responsibilities of a Regional School District and Regional School Committee are set out in Chapter 71 of the Massachusetts General Laws. Our Regional School Committee consists of 7 elected members serving three year terms.

We understand that the route of the proposed pipeline has been drawn with a wide brush and that further refinements will be forthcoming. The safety of our students, staff and general public is understandably foremost in our minds as we learn about the NED project and route. While it may be that the risk of a failure or leak is fairly low for a pipeline such as is proposed, we believe it is self-evident that the consequences could be calamitous. We request that the route be altered to pass further from our high school for many reasons:

- The pipeline route is proposed to bisect the conservation area on this parcel. The conservation land is intended to preserve wildlife corridors and habitat. To disturb this area and maintain a permanently cleared pathway would eliminate it's use for wildlife preservation.
- The property was obtained and the high school built, using funding from the Massachusetts School Building Authority (MSBA). This program continues to reimburse our regional district for a portion of the capital project loans. These loans have approximately another decade prior to payoff and dissolution of this relationship with MSBA.
- To say that our high school serves as a public gathering place is to understate the frequency of events - athletic events, fine arts productions, community meetings and the like are weekly events throughout the year. Town based youth sports utilize our fields daily throughout the year for practice and competitions. Graduation takes place, weather permitting, within the oval of our track.
- The currently proposed route comes within 600' of the track mentioned above. This puts significant parts of our facilities within the 950' hazard area radius for a 36" diameter pipeline. Additional safety precautions and maximum transmission pressure should be considered.
- The currently proposed route divides our main site from our emergency secondary access, required by the fire and police departments to maintain public safety. The inability to use this emergency egress would limit us to a single access road approximately 20' wide. This would be inadequate should we need to evacuate the property or bring in multiple emergency vehicles.
- It is possible that the high school would serve as an emergency shelter for our towns should there be need in the communities. We have in the past used school buildings in emergency situations. Clearly this use would be infeasible if the high school parcel were impacted by an emergency due to the proposed gas pipeline.



We very much appreciate the time you've taken to review our concerns and the entire application of Tennessee Gas with respect to this project. There are numerous concerns and questions that we and others in the community have shared with Tennessee Gas. We look forward to learning more and working with the permitting authorities as this project moves forward. Please do not hesitate to contact me with questions or for clarification of our parcel or situation.

Regards,

Alison Manugian

Alison Manugian
 Chair – Groton Dunstable Regional School Committee
 amanugian@gdrsd.org
 978-448-2823