



April 18, 2014

James F. Blais, Jr.  
Northeastern Land Services  
Contract Land Agent to Tennessee Gas Pipeline Company  
1615 Suffield Street  
Agawam, MA 01001

**Re: Northeast Gas Pipeline Expansion Project Request to Survey Mass Audubon Properties**

Dear Mr. Blais:

I am writing in response to your request to survey several Mass Audubon properties for boundaries; physical features; geotechnical aspects; archeological resources; wetlands and streams; and rare, threatened, or endangered species. The properties involved are the West Mountain Wildlife Sanctuary (Hampshire County, Plainfield, Map/Parcel 25-003; 19-001; 20-003), Pleasant Valley Wildlife Sanctuary (Berkshire County, Lenox, Map/Parcel 21/0/1/0 and 22/0/10/0), and Cheshire Pond Wildlife Sanctuary (Worcester County, Ashburnham, Map/Parcel 15/9).

Mass Audubon respectfully declines the requested permission and does not grant any permission to access or survey these or any other Mass Audubon properties, at this time.

We have a number of reasons for this decision. In summary, our key considerations include the fact that there has not been any public process at the local, state or federal levels of government examining the purported need for the proposed gas pipeline; no alternatives such as smaller-scale improvements to gas distribution infrastructure have been proposed; and there has been no analysis of potential alignments for any essential infrastructure improvements. We are writing to the Governor of Massachusetts and his agencies requesting the initiation of an open, transparent, and deliberative process to address these important energy resource-planning issues. Should that process result in a determination that some form of energy infrastructure expansion is necessary, we expect that there will be a public review of siting and construction alternatives necessary to avoid, minimize, or mitigate environmental impacts. Any new energy infrastructure should be sited to avoid and minimize impacts to public and private conservation lands, large forest blocks, wetlands and water resources, and rare species habitats.

In the event further public review leads to a need to survey public or privately owned conservation lands, Mass Audubon will seek careful definition of the protocols for undertaking

those surveys. Rare, threatened, and endangered species are a challenge to locate and document, and we want to be certain that any research and investigations for such resources are rigorous and conducted based on protocols developed in consultation with affected landowners and the Massachusetts Natural Heritage and Endangered Species Program. We also want to be certain that every precaution is taken during all types of surveys to prevent introduction or spread of invasive species or other disturbances to sensitive natural habitats and soil or water resources.

Thank you for taking the time to meet with Mass Audubon staff and discuss the project. If you have any questions, please contact Gary Clayton, Vice President for Conservation Programs, 781-259-2160, [gclayton@massaudubon.org](mailto:gclayton@massaudubon.org) or Heidi Ricci, Senior Policy Analyst, 781-259-2172, [hricci@massaudubon.org](mailto:hricci@massaudubon.org).

Sincerely,



Henry Tepper  
President

ehr:jjc:HGT

cc: Richard Sullivan, Secretary Executive Office of Energy and Environmental Affairs  
Jack Murray, Commissioner, Department of Conservation and Recreation  
Mary Griffin, Commissioner, Department of Fish and Game  
Susan Reid, Director Conservation Law Foundation Massachusetts  
Charles Knox, Executive Director, Massachusetts Land Trust Coalition  
Eugene Benson, Executive Director, Massachusetts Association of Conservation Commissions

*Mass Audubon works to protect the nature of Massachusetts for people and wildlife. Together with more than 100,000 members, we care for 35,000 acres of conservation land, provide school, camp, and other educational programs for 225,000 children and adults annually, and advocate for sound environmental policies at local, state, and federal levels. Founded in 1896 by two inspirational women who were committed to the protection of birds, Mass Audubon has grown to become a powerful force for conservation in New England. Today we are respected for our science, successful advocacy, and innovative approaches to connecting people and nature. Each year, our statewide network of wildlife sanctuaries welcomes nearly half a million visitors of all ages, abilities, and backgrounds and serves as the base for our work. To support these important efforts, call 800-AUDUBON (283-8266) or visit [www.massaudubon.org](http://www.massaudubon.org)*