

TOWN OF LIBERTY
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Friday, December 15, 2006

Magalie R. Salas
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

RE: Docket # PF06-13-000

Dear Sirs:

This letter is written pursuant to the Supplemental Notice of Intent to Prepare an Environmental Impact Statement for the Downeast LNG Project and Request for Comments on Environmental Issues Related to the Potential Expansion of the Maritimes & Northeast Pipeline System.

The Town of Liberty has many concerns with the intent to place an expansion Loop within the town. These concerns have been documented previously, at public hearings with FERC, with our local and State legislative bodies, and in writings related to Docket RE: Docket # PF05-17-000.

These concerns can be summarized as follows:

1. With the Sable Island reserve drying there is a desire for any expansion and resultant environmental impact to be consistent with a sustainable supply. The large environmental impacts associated with the proposed expansion should be in step with long term supplies of LNG. The Town of Liberty has written in support of the increased pressure in the existing line and the addition of new compressor stations with the understanding that these measures would negate the need for additional pipeline expansion. We were informed that this increase in capacity was sufficient for known supplies. Building such a facility at the expense of the environment and our town's local character is even more out of line with the knowledge that Maine benefits little by this added flow of LNG. Little of the LNG from these expansion lines will be used in Maine; certainly most power generated will be exported out of state.
2. Environmental impacts include deforestation, cutting of tree farms, devaluation of properties reserved for conservation easements, crossing streams, wetlands, vernal pools, and fracturing of massive bedrock formations that affect wells and water distribution. Contrary to the previous proposals application, the Town believes that the blasting of a trench through a vernal pool is indeed an irreversible act. There is concern that vernal pools have not been given proper importance and that the buffer "edge" around such pools is valuable. Past impact statements have equated already affect wetlands (subject to previous expansions) with untouched vernal pools as reason for expanding the corridor.

3. The project proposes to "take" land through eminent domain. Some of these lands are held for natural resource use and tree farms. As if the expansion of the cleared area is not enough, Maritimes & Northeast proposes to take additional land from adjoining land owners, even when there is available land within the existing corridor for gas line construction. The impact of this taking is unnecessary widening of the corridor.

4. It was made clear in previous proposals that a project of this scope need not comply with local land use ordinances nor would the applicant make application before our town of Liberty Planning Board. This lack of compliance with local land use ordinances denies our town due process and is inconsistent with the values of our town and to the many residents that have faithfully complied with these ordinances to steward our natural resources.

5. The expansion loop creates a significant "hole" through the landscape that affects deer yards, natural habits, and provides a mechanism for substantial ATV and "mud runners" use through these corridors. Unrestricted motorized vehicle use through these expanded corridors further threatens the wetlands. Past proposals failed to include building of rock walls or the replanting of trees. Re-planting of a stand of trees is also an option that has not been provided in past proposals. Wildlife requires the edge provided by a forest buffer for many reasons. The serious impact of noise and the impact of vehicular traffic so close to a wetland is an additional consideration for the environment. Replanting of trees demonstrates this project's concern for the forest and the privacy that residents and wildlife alike have enjoyed in this rural environment. While Maine forests are rarely replanted, typically they first re grow as "pucker brush" , low class fast growing trees, like grey birch and poplar and raspberries etc. To re-establish a valued wood stand requires attention and selective harvesting or re planting.

6. In addition to the clearing for the pipeline itself, Maritimes & Northeast has proposed considerable clearing where construction across major roads takes place. These expansions further increase the corridors. Construction engineering plans have not been fully included in past environmental impact statements.

Thank you for providing this opportunity to comment. Please provide documentation that this comment has been received.

Sincerely,

John A. Krueger, Second Selectman, Town of Liberty

cc
(2) Copies, one for OEP/DG2E/Gas Branch 3

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