IN59 – Jerry C. Shaw

200702225024 Received FERC OSEC 02/22/2007 12:01:00 PM Docket# CP06-54-000

Jerry C. Shaw
188 Thimble Islands Road
Branford, CT 06405
February 14, 2007

Ms. Magalie R. Salas, Secretary
Federal Energy Regulatory Commission
888 First St. N.E., Room 1A
Washington, Dc 20426

Re: Docket CP06-54-000 BroadWater

Dear Secretary Salas:

IN59-1 In a recent publication of the draft environmental impact statement (DEIS) for BroadWater, the following report from Sandia National Laboratory was not referenced.

SAND2005-7339, Unlimited Release, Printed January 2006, Cabrillo Port Report

http://www.slc.ca.gov/Division_Pages/DEPM/DEPM_Programs_and_Reports/BHP_Deep_Water_Port/RevisedDraftEIR/1aCabTransport/Appendices/C2_Sandia%20Review.pdf

IN59-2 What is particularly alarming about this report is that it was conducted after the initial Sandia report published in 2004, SAND2004-6258 that the USCG used as the basis for their Water Suitability Report, as documented in the DEIS for the BroadWater project (BW), and neither the USCG, Sandia, the FERC, nor the DOE have decided to notify the public of the possible consequences.

IN59-3 I've confirmed that SAND2005-7339 was never referenced in the BW/FERC DEIS.

IN59-4 Apparently, there were significant errors in the dispersion modeling that was used for BW. See pp. 24-26 of the above report. These errors have resulted in a significantly smaller estimate of the extent of the vapor cloud and potential firestorms used by USCG for BW, than those in the Cabrillo Port project.

IN59-5 The Cabrillo Port project looks just like BW. If the BW LNG carrier route maps are redone using the Cabrillo Sandia study, it will result in almost a doubling of the width of Hazard Zone 3, with significant overlaps with recreational fishing and shoreline populations.

IN59-6 What is unknown at this time is the rationale for the decision to use single-tank assumptions by BroadWater's modeling contractor. Obviously, the volume of the source of an LNG release matters. We should understand why the 2-tank assumption was used

IN59-1 We revised Section 3.10.3.2 of the final EIS to refer to the Sandia National Laboratory risk analysis of the proposed Cabrillo Port Project, and to describe why that analysis was specific to the physical properties of the proposed Cabrillo Project and is not applicable to the Broadwater Project.

IN59-2 Please see our response to comment IN59-1.

IN59-3 Please see our response to comment IN59-1.

IN59-4 Please see our response to comment IN59-1.

IN59-5 Please see our response to comment IN59-1.

IN59-6 The risk analysis described in Section 1.4.3 of the WSR (Appendix C of the final EIS) assumed the simultaneous loss of three cargo tanks from the FSRU as well as from an LNG carrier. As noted in our response to comment IN59-1 Section 3.10.3.2 of the final EIS addresses the differences between the risk analysis conducted for the proposed Cabrillo Port Project and for the Broadwater Project.

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IN59-6 for Cabrillo, and not BW. Nonetheless, whether 1-tank or 2-tank, errors in the previous models used is significant reason to question the USCG BW results based on the 2004 Sandia study.

Several points:

IN59-7 1) A newer (Cabrillo Port) report on the extent of Hazard Region 3, suggests almost a doubling of size to over 7 miles from over 4 miles.

IN59-8 2) Uncertainty in modeling has never been presented in the DEIS. Hazard regions are depicted as hard lines of demarcation without any uncertainty bands shown (fuzziness), and now with a new Sandia report it has been revealed just how large this uncertainty really is.

3) Part of the validation of any model is a comparison with experimental data. There have never been experiments conducted by the DOE on the effects of a release of LNG clouds over water, and their subsequent transport and ignition in differing atmospheric conditions.

IN59-9 4) This represents a significant increase in the size of the safety zones surrounding BW LNG tankers and the FSRU, as shown in the LNG carrier route maps included in the BW DEIS, which now, with the new Cabrillo study, should have increased safety zones redrawn.

IN59-10 5) The possible, predicted danger to a much larger recreational fishermen and shore community population from a vapor cloud and possible firestorm events is substantially increased, counter to the claims of BW not to affect substantial populations.

IN59-11 6) As noted by the Connecticut Governor's Broadwater Task Force, oxygen depletion from such above-earth overhead firestorms could result in substantial loss of life.

Conclusion

In conclusion, the modeling efforts of several organizations, including Sandia, a modeling contractor for Sandia – ACE, the modeling consultant for BroadWater, and the FERC have all resulted in substantial differences in estimates of the dispersion of vapors that define hazard region 3. These uncertainties are not reflected graphically in the BroadWater/FERC DEIS, and, thus, grossly under-emphasize the lack of definitive scientific support for the extent of potential human fatalities due to LNG carrier venting of natural gas vapors and firestorms in the vicinity of LNG tankers in the event of accidental or terrorist actions.

Sincerely,

Jerry C. Shaw

IN59-7 Please see our response to comment IN59-1.

IN59-8 Please see our response to comment IN59-1. The outer edges of the hazard zones presented in both the final EIS and the WSR (Appendix C of the final EIS) are considered the reasonable outer limits of the zones, and account for estimates and assumptions included in the modeling.

IN59-9 Please see our response to comment IN59-5.

IN59-10 Please see our response to comment IN59-1.

IN59-11 The resource sections in Section 3.0 of the final EIS have been revised to address potential impacts from an LNG vapor plume.

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ORIGINAL

Peter B. Brown

January 25, 2007

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FEDERAL ENERGY
REGULATORY COMMISSION

Magalie R. Salas, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C., 20426

Re: Broadwater Energy Docket Nos. CP06-54-000, CP06-55-000, and CP06-56-000

Dear Secretary Salas:

I live on Pot Rock Island, one of the Thimble Islands, off the coast of Branford, CT. If I'm not the resident nearest to Broadwater, I'm one of the nearest. By virtue of nothing in between, I'm adjacent to this proposed LNG Gasification plant. I am absolutely opposed to the Broadwater proposal. I would be immediately and personally affected by this project. This industrial eye sore would, day and night, for ever and ever scar the horizon. It would detract from the value of my real estate. The EIS could not be more neglectful in how it failed to realistically address the negative affect of the visual impact that this ugly industrial project could have on property values on shoreline and Thimble Island property, especially those directly facing this plant..

IN60-1

Broadwater can not mitigate the aesthetic degradation of our most beautiful natural surrounding. The flare tower is 285 feet tall. By day we'll view the moored barge, ¼ of a mile long and 100 feet tall. It is by all accounts massive and nasty. All during the night the work lights, security lights, safety and navigation lights will disrupt our skyline. Beacons and perhaps flames will illuminate off the top of flare tower. They need to place this "uglification" plant in an area already affected by industrialization. Do not permit this monstrosity to be built in the center of our pristine PUBLIC open space. It's a nasty eyesore smack in the middle of our public "view shed".

IN60-2

Plain and simple, the proposal is no less than a taking by a private company. It's a government give away. It's a condemnation and taking of our public rights. Why is this not a sale? Where are the proceeds being sent? Is this the result of the secret Cheney Energy Policy Meetings? How much money has Shell contributed to the Federal politicians who in turn have secured your FERC jobs? This is a shameful harmful proposal and it should never have advanced as far as it has. Be honest, is the fix already in? Have the powerful energy company interests risen above the democratic principle of "of the people, by the people, for the people"?

Based on more arguments of public interest this permanently anchored Liquefied Natural Gas (LNG) processing plant will negatively affect the ecology of Long Island Sound. Consider the traffic from foreign ships carrying foreign organisms on their below waterline undercarriages and their cleaning of ballast and bilges. Consider lubricants spilled from the yoke mechanism. Consider the cataclysmic events. Remember the Exxon Valdez. Remember the Cole. Combine the two. Wow! Pow! The EIS was inadequate and tainted by Broadwater. It is a sham. Alternative energy

IN60-3

IN60-1 In preparing Section 3.6.5 of the final EIS, we reviewed the existing economic literature to assess the potential impacts to property values associated with the FSRU. This literature, which includes studies related to LNG facilities, indicates that effects do not extend beyond a few miles. Because the Broadwater Project would be a unique facility and would be 9 miles from the nearest shoreline, and even greater distances from most properties (approximately 10.5 miles from Outer Thimble Island), we also reviewed studies assessing potential impacts to property values associated with landfills, power lines, and offshore wind farms. Based on our literature review, the visual impacts assessment reported in Section 3.5.6, the risk assessment reported in Section 3.10.3, and the conclusions reached for the impacts of the proposed Cabrillo Port Project's FSRU (CSLC 2006), we consider it unlikely that implementation of the proposed Project would affect property values.

IN60-2 Section 3.5.6 of the final EIS describes the impact of the Project on visual resources. As noted in that section, we anticipate that the FSRU would have a moderate impact on visual resources.

IN60-3 Section 4.0 of the final EIS evaluates a wide variety of alternatives to the proposed Broadwater Project; and it was concluded that they could not provide similar volumes of natural gas or energy equivalents to the New York City, Long Island, and Connecticut markets with less environmental impact than the Broadwater Project. These alternatives include energy conservation and renewable energy sources (including wind and tidal power), as well as other existing and proposed LNG terminal and pipeline projects.

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IN60-3

sources need to be revisited and thoroughly explored in the Draft Environmental Impact Statement. You can deny this based simply on that there is no sufficient case built for the need for this floating monster.

Broadwater is not a solution; it is a symptom. This project would delay the implementation of alternative domestic energy sources, increase our dependence upon foreign suppliers, and put at risk our coastal environment, let alone create safety risks for my family and maybe thousands of others. This project would detract from, not enhance, the overall quality of all our lives.

To summarize and conclude please deny this LNG plant on grounds that include any one or more of the following:

- Extreme Aesthetic Degradation.
- Safety.
- Environmental Impact on LI Sound.
- Doubtful need.
- Security.

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Mr. Thomas G. Cleveland
26 B School Street
Branford, CT 06405

Phone: 203-488-3644 **Cell: 203-981-9040**

January 16, 2007

Ms. Magalie Salas, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

Re: Broadwater LNG Project, CP06-54-000, CP06-55-000

Dear Ms. Salas:

Thank you for the opportunity to present my input and reaction to the Draft Environmental Impact statement on the Broadwater proposal to site an LNG terminal in the middle of Long Island Sound.

I oppose the project as presented and feel that the EIS is deficient in three primary areas.

IN61-1 First, the EIS underestimates the cumulative environmental impacts that the construction and use of the terminal will have on the Sound. We cannot expect that the trenching, the water usage, and the continual lighting will not have a significant impact on the way life in the Sound is lived. The very presence of the industrial activity destroys marine habitat that cannot be replaced.

IN61-2 Second, this draft refuses to acknowledge that there is currently no clearly defined need for the LNG it proposes to provide. The Synapse Energy Economics report commissioned by Save the Sound and the CT Fund for the Environment shows that energy conservation could almost completely offset Broadwater's long term forecast of natural gas demand. Further, the two Canadian terminals, ***already under construction, and meant to service the Northeast market***, will prove more than adequate to supplement any shortfall of supply.

IN61-3 I also feel that the EIS fails to adequately explore the environmental impacts of pipeline construction to increase existing pipeline capacity. The EIS has no information to suggest that Broadwater's proposed terminal will have a smaller environmental impact than increasing pipeline capacity.

IN61-4 Lastly, the Sound is a public resource. It should not be taken for private gain by anyone, no matter how big, no matter how influential, no matter how adept that anyone is. The EIS fails to address the impact of this taking on the public.

It is now up to you, the members of FERC, to carry out your duty to protect this public resource and to deny the Broadwater application.

Regards,

Tom Cleveland

IN61-1 Seafloor impacts would largely be temporary to short term and would constitute less than 0.1 percent of the seafloor in Long Island Sound. Water usage would constitute less than 0.1 percent of the volume of Long Island Sound, with the large majority of it serving as ballast water using standard shipping practices. Lighting would be minimized to the maximum degree allowable while providing a safe working environment in compliance with navigation and aviation requirements.

IN61-2 Section 1.1.5.4 of the final EIS addresses the Synapse report and updates to that report. As noted in that section, although we agree that the proposed solutions to the long-term energy needs of the region presented in the Synapse report are conceptually sound, they are not practical because they would require major (currently unidentified) commitments of capital for development of renewable resource energy projects and a major commitment by energy users to change use habits, including financial commitments to replace existing equipment. These commitments are not proposed and may not be presumed.

As described in Section 4.3.2 of the final EIS, delivery of natural gas from Canadian LNG facilities to the market Broadwater would serve would require installation of a substantial amount of new infrastructure. We have determined that the environmental impacts associated with the new infrastructure would be greater than the impacts of the Broadwater Project with implementation of our recommendations.

IN61-3 Section 4.3.1 of the final EIS has been updated to provide additional characterization and quantification of potential impacts associated with pipeline system alternatives.

IN61-4 Section 3.5.2.2 of the final EIS indicates that the Project would not represent the first time that the waters of the Sound would be used for private purposes. Commercial and industrial structures in or under the waters of the Sound include cable crossings, natural gas and petrochemical pipelines, and two petrochemical platforms. Because the Project would provide a benefit to the public by helping to meet the energy needs of the region with minimal impacts, the Project could be considered to be consistent with the objectives of the Public Trust Doctrine. Section 3.5.7.4 of the final EIS addresses environmental issues associated with the Public Trust Doctrine. However, legal issues related to public trust lands are not a component of our environmental review process and therefore are not included in the final EIS.

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ORIGINAL **FEDERAL ENERGY REGULATORY COMMISSION**

BROADWATER LNG PROJECT (CP06-54-000 AND CP06-55-000)

DRAFT ENVIRONMENTAL IMPACT STATEMENT COMMENT FORM

Comments may be left at the FERC table or mailed to the FERC:	**Comments may be submitted to the FERC via the Internet on the FERC's website:**
If you prefer to mail your comments, please send an original and two copies of your comments to: Magalie R. Salas, Secretary Federal Energy Regulatory Commission 888 First St., N.E., Room 1A Washington, DC 20426 Reference **Docket Nos. CP06-54-000 and CP06-55-000** on the original and both copies, and label one copy of your comments for the attention of the **Gas Branch 3, DG2E.**	See the instructions at http://www.ferc.gov under the "e-Filing" link and the link to the User's Guide. Prepare your comments in the same manner you would if you were providing a letter and save the comments to a file on your hard drive. Before you can submit comments you will need to create an account by clicking on "Sign-up" under "New User?" You will be asked to select the type of submission you are making. This submission is considered a "Comment on Filing."

COMMENTS (PLEASE PRINT) *–additional space on opposite side of page*

IN62-1 I can't trust your conclusions due to the fact that your basic geography is wrong. Norwalk Shoal does not divide the Eastern and Central Basins - it does not exist. It is not on any of my charts. Do you mean Six Mile Reef?

IN62-2 A video review of the bottom of the Sound is not sufficient to judge the quality of the bottom. Physical examination must be done to get an accurate assessment. OVER

Commentor's Name and Mailing Address (*Please Print Clearly*)

BARRY GORFAIN
26 LUCE AV.
NIANTIC, CT. 06357

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IN62-1 The text in the final EIS has been corrected to identify Mattituck Sill as the delineation between the central and eastern basins.

IN62-2 Thank you for your comment. Section 3.3.1.1 of the final EIS has been expanded to more fully describe the benthic communities along the proposed pipeline route based on existing literature and quantitative benthic sampling. Video was not used, solely, to characterize the benthic community. The sampling protocol and laboratory results for the Project-specific sampling are publicly available in Resource Report No. 3 – Fish, Vegetation, and Wildlife in FERC's docket for the Broadwater LNG Project (Docket No. CP06-54-000, Accession #20060130-4018).

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COMMENTS (continued)

IN62-3 Also, you did not include the ferry that runs from Noank to Fisher's Island in your boating traffic report.

IN62-3 The ferry from Noank to Fishers Island was not included in the EIS because the LNG carriers would not affect ferry traffic using that route.