Subject: Islander East Appeal
Resent-From: Islandereast.Comments@noaa.gov
Date: Thu, 15 May 2003 23:49:39 EDT
From: <KKennedyMD@aol.com>
To: IslanderEast.comments@noaa.gov

Attached please find the comments from CT Stop the Pipeline for the Islander East Appeal. I will also paste a copy of the word document into an e-mail as a back-up, although the Word document will be easier to read!

very much appreciate the opportunity to comment.

Respectfully submitted,

Katherine Kennedy, M.D.
Spokesperson for CT Stop the Pipeline

CTStopthePipeline5_03Comments.doc	**Name:** CTStopthePipeline5_03Comments.doc **Type:** WINWORD File (application/msword) **Encoding:** base64 **Download Status:** Not downloaded with message

Subject: Word Doc Pasted Into E-mail: Part 1
Resent-From: Islandereast.Comments@noaa.gov
Date: Thu, 15 May 2003 23:52:49 EDT
From: <KKennedyMD@aol.com>
To: IslanderEast.comments@noaa.gov

CT STOP THE PIPELINE POST OFFICE BOX 578 BRANFORD CT 06405

May 15, 2003

Donald Evans, Secretary of Commerce
c/o Office of the General Counsel for Ocean Services
National Oceanic and Atmospheric Administration
U.S. Department of Commerce
1305 East-West Highway
Silver Spring. MD 20910

Re: Appeal by Islander East Pipeline Company, L.L.C.

Dear Mister Secretary:

am writing to express our organization's strong opposition to the proposed Islander East Pipeline Project.

Specifically, we oppose the appeal submitted by Islander East, L.L.C. to your agency after the Connecticut Department of Environmental Protection (CT DEP) found the project to be inconsistent with Connecticut's federally-approved Coastal Zone Management Program (CZMP).

We are writing to ask that you deny the appeal by Islander East and support the determination of the CT DEP that this project is not consistent with Connecticut's CZMP.
CT Stop the Pipeline is a local grassroots organization that began in August 2001 in response to community concerns about the Islander East Pipeline project. We are an association formed to protect Connecticut and Long Island Sound from the negative environmental consequences of cross-Sound energy projects, such as natural gas pipelines. In the fall of 2001, we conducted a petition drive in our community and collected 5577 signatures in opposition to the Islander East Pipeline project which we are forwarding to you under separate cover.
We are simply citizens who love our Connecticut coastline and community. We are looking to you to hear our voices and continue to help us protect our community.

We understand that the Department of Commerce can either support the determination of the CT DEP or overturn it by substituting your agency's judgment and/or by determining that this pipeline is in the national interest.

Before addressing these areas, I would like to bring your agency's attention to some background issues about Islander East and their recent approval process.

Background Issues

Issue I:
First, although the Federal Energy Regulatory Agency (FERC) did issue Islander East a Certficate of Public Convenience in September 2002, we assert that the economic needs upon which FERC based their decision were flawed:
" FERC based their information primarily, if not solely, on economic information provided by the applicant, Islander East
" FERC did not seek an independent opinion regarding Long Island's future natural gas needs
" Islander East's information was based on pre-September 11, 2001 data; FERC required no updated data following September 11, 2001.
" Islander East has four precedent agreements - two are with KeySpan Energy gas distribution systems, KEDNY and KEDLI, and two are with future gas power plants, AES Endeavour and Brookhaven. However, there are serious concerns about these agreements:
o AES Endeavour still has not opened their New York State application and will likely never be built
o Brookhaven is in their permitting process but has access to an existing KeySpan lateral; their Vice President,

Robert Charlebois has written that their power plant can fully operate without a gas supply from Islander East.
o Since KeySpan Energy is a 50% co-investor in Islander East, we are concerned that the apparent sole purpose for Islander East will be to supply subsidiaries of an investing company and are concerned that although KeySpan Energy will profit, it will be at the expense of Long Island ratepayers who will ultimately have to cover the cost of the additional - possibly unnecessary - infrastructure.

" The impact of this project on the existing gas infrastructure on Long Island needs further study.
o One of the primary objectives of this project - to deliver increased volumes of natural gas to Long Island - is questionable since 75% of the volume is expected to be for KEDNY and the current infrastructure on Long island may not be able to transport this additional volume to KEDNY without displacing already existing volumes of natural gas.

" Long Island's energy needs have changed since the application was made in June 2001:
o Cross Sound Cable has been laid across LIS although it remains to be seen if it is ever electrified; if it is it will bring 330 megawatts of new electricity to the Long Island Energy market. The impact of the Cross Sound cable on Long Island's energy market is an area for further study (for the record, CT Stop the Pipeline is also strongly opposed to the Cross Sound Cable.)

o The Iroquois Pipeline Company withdrew their proposal for the Eastern Long Island Extension - even though it had received a Preliminary Determination from FERC in September 2002 - which would have come off an underwater tap offshore Milford, Connecticut and run across Long Island Sound to within a short distance from where Islander East would make land.

o The energy investment market is in flux and investors are canceling or postponing projects. According to a Wall Street Journal article on May, 13, 2002, "In New York City, the financing shortage claimed three proposed plants that would have covered about half of a projected 3000 megawatt shortfall by 2005. Wall Street bankers are unapologetic. "Why should the capital markets give you money to build some power plants people may not need, or when the demand is exceedingly uncertain?" Asks Leonard Hyman, a senior advisor at CitiGroup's Salomon Smith Barney unit." This suggests that either or both of the two power plants that Islander East has precedent agreements with -- AES Calverton and Brookhaven -- may not be built. This area needs further examination.

o Long Island is looking into an offshore "experimental" wind turbine; this is an excellent option for alternative energy on Long Island and it is possible that wind power could be sufficiently developed in the near future to be a substantial source of power to the Long Island energy market.

o NYISO has approved Neptune which could supply up to 4700 MW of power to the Long Island area markets; this would certainly impact Long Island's overall energy needs.

In sum, the economic data upon which Islander East asserts it is needed is incomplete, unreliable and has not been updated since before September 11, 2001.

Issue II:
Second, the FERC approval process for Islander East has been criticized by the United States Environmental Protection Agency's Regional Administrator, Robert W. Varney, who listed several flaws with FERC's decision-making process in a September 30, 2002 letter to FERC.

First, Mr. Varney critiqued FERC for ignoring the Long Island Sound Moratorium. He reminded FERC that the purpose of the Moratorium was so the Task Force could "more fully inform regulators and legislators about the need for and location of additional transmission capacity" and thereby protect "the numerous marine resources of Long Island Sound." Mr. Varney pointed out that "numerous commentators, including the EPA" had also asked FERC to compare all competing cross-Sound pipeline projects together. Mr. Varney seemed concerned that FERC had chosen to look at the projects in the order of the date of their application instead of reviewing all cross-Sound proposals simultaneously in order to protect environmental interests.

Second, Mr. Varney questioned FERC's rationale for disregarding the ELI Systems Alternative route -- the route through Milford that the FEIS (Final Environmental Impact Statement) found to be "environmentally preferable" to Islander East's preferred route through Branford. The EPA appeared unable to fathom why FERC ignored this data: "It is not clear, however, why this alternative did not become the preferred alternative as it appears to satisfy the project need with less impact of the environment."

Third, Mr. Varney suggested that FERC moved too quickly with their rapid approval of Islander East less than 30 days after the issuance of the FEIS. "The approval comes almost two weeks in advance of the end of the typical

thirty day wait period on the FEIS. As a result, the comments that EPA and other parties are making on the FEIS regrettably were not considered as part of the FERC decision on September 18, 2002."

Fourth, Mr. Varney substantially critiqued the FEIS: "the FEIS lacks the detailed information necessary to understand the direct, indirect and secondary impacts to wetlands and waters of the United States associated with the proposed project." Essentially, the FEIS is wholly inadequate to assess the extent of the environmental impacts.

Finally, in boldface, Mr. Varney stated: "The EPA cannot agree withâ€¦the FEIS which concludes that the construction and operation of the Islander East Pipeline Project would result in limited adverse environmental impacts." To us, this would suggest that the impacts are long-lasting and significant.

The final part of the letter, including a four page addendum, detailed the EPA's prodigious "environmental concerns about this project [Islander East]."

The EPA listed the impacted areas -- 3100 acres of Long Island Sound, 125.5 acres of forested habitat, 83.1 acres of open lands and 3.1 miles of wetland crossings - and followed with four pages of significant questions, overlooked by the FEIS, that still required rigorous analysis.

In sum, we concur with the appraisal of the Regional EPA that the FERC process was flawed and more importantly, that the FEIS is inadequate to assess the full environmental impacts.

Issue III:
While we are, for the record, in opposition to all cross-Sound pipelines, we cannot fathom why Islander East is so opposed to considering the ELI Systems alternative, which has been certified by the FEIS as the least environmentally damaging route. We are concerned that Islander East's opposition suggests that profit, not meeting Long Island's energy needs, is the real motive.

In sum, a closer look at the Eli Systems Alternative and at other cross-Sound and non-cross-Sound alternatives is still warranted.

Issue IV:
The Islander East pipeline's route - through North Branford, Branford and the Thimble Islands - is not an industrial area. There is an old steam railroad that was built over a century ago, and has been grandfathered into the local zoning ordinances. The area is primarily residential with some farmland. Most of the land in these towns is privately owned with little open space, except for that afforded by the protected wetlands and the beautiful wooded areas owned by the Branford Land Trust, a wonderful organization which, over the years, has received generous donations or in some cases, purchased the land. The Branford Land Trust has created lovely walking trails, open to the general public, which add great beauty and value to the area, as well as create significant, if not small environmental niches that support area wildlife and plant species.

The Thimble Islands are an area of both great natural beauty and recreation, including boating, sailing and fishing. There is no similar area in the rest of all of Long Island Sound. The islands, especially Outer Island, serve as a touchdown for many migratory bird species. Harbor seals, an endangered marine mammal, were seen hauling up on one of the islands this Spring 2003 by the Norwalk Maritime Aquarium. There are wonderful fishing grounds that run adjacent to the Thimble Islands - and the pipeline route. The shellfish grounds are plentiful and pristine. The potential for loss to this area is extraordinarily great.

We do not live in an area of great expanse, like areas in the Maine Woods. Any habitat loss is a significant one that can never be made up. The pipeline would create a minimum of 50 feet of clearcut area through much of this open space. This would significantly and irrevocably alter this habitat for area wildlife, migrating bird species and human recreation. The pipeline would take away from our community these treasured woodland walks. Our community would never be able to be made whole.

In sum, Islander East's route is through an area that is NOT industrial and that will deprive the area wildlife and citizens of a valuable and unique environmental niche that can never be replicated elsewhere.

Issue V:
Islander East has not provided the full scoping of the environmental impacts of the project to either the FERC, the Connecticut Siting Council or any of the relevant state or federal agencies.

From the precedent agreements that Islander East obtained as support for their project, we can deduce that additional projects are necessary in order for Islander East to fulfill their contractual obligations. However, Islander

East has not yet made an application for any of these additional projects. This does not allow any of the state or federal agencies the ability to fully evaluate the environmental impacts of this project.
In the following table from Exhibit G of Islander East's June 15, 2001 application to FERC, both minimum and maximum Dekatherm (Dth) expectations are provided based on the precedent agreements with AES Calverton, ANP Brookhaven, KEDLI and KEDNY. It is assumed that Islander East will be contractually obligated to meet these maximum and minimum capacity guarantees. These estimates were used by the FERC to determine that there is a demonstrable need and contributed to the December 2001 Preliminary Determination by the Commission.
As can be seen in the table, Islander East plans to transport 260,000 Dth on a firm basis and 25,000 Dth on an interruptible basis for a total of 285,000 Dth. According to this, Islander East lists a maximum Daily Transportation Quantity of 300,000 Dth in November 2004. If this is accurate, then Islander East will exceed their capacity of 285,000 Dth. Even if only the minimum capacity estimates are met in November 2004 (280,000 Dth,) then by November 2005, the minimum Daily Transportation Quantity will be 317,500 Dth; even this will far exceed 285,000 Dth of capacity. Islander East will need to increase capacity as soon as November 2004 but no later than November 2005, according to the data provided in the June 2001 application to FERC.

Customer
Maximum Daily Transportation Quantity (in Dth per day)

11/1/03
11/1/04
11/1/05
11/1/06
11/1/07
11/1/08

ANP Brookhaven
90,000
90,000
90,000
90,000
90,000
90,000

AES Calverton
60,000
60,000
60,000
60,000
60,000
60,000

KeySpan Long Island (maximum)
60,500
82,500
112,750
134,750
162,250
162,250

KeySpan Long Island (minimum)
60,500
71,500
92,000
114,000
138,000
162,250

KeySpan New York (maximum)
49,500
67,500
92,250

110,250
132,750
132,750

KeySpan New York (minimum)
49,500
58,500
75,500
93,000
112,000
132,750

Maximum MDTQ
260,000
300,000
355,000
395,000
445,000
445,000

Minimum MDTQ
260,000
280,000
317,500
357,000
400,000
445,000

The pipeline industry has the capability of increasing capacity by either adding compression or by adding more pipe through looping or installing a larger diameter pipe.
With the current pipe technology that Islander East has, Islander East cannot increase capacity by adding compression: the thickness of the pipe precludes that as an option.
Therefore, in order to increase capacity, Islander East will need to do looping or replace pipe by November 2005. This looping/pipe replacement will have to occur along the entire Cheshire through Branford route, not just in North Branford and Branford as in the June 2001 application.
The laying of new pipe or looping through Cheshire and North Haven will add significantly to the overall environmental impact, especially since the route is near the Cheshire watershed. In the current application, Islander East is only requesting to retest pipe in this 13.3 mile section from Cheshire to North Haven and to replace anomalous areas where the pipe is too thin to withstand the pressure increase that Algonquin/Islander East requires.

According to local engineers, this section of pipe predates DOT safety regulations and was never designed for the increased pressure Islander East is plans to use for this project. Moreover, this area of pipe will experience a pressure drop of over 19 PSI per mile -- this is unsatisfactory by engineering standards and will likely have to be upgraded regardless of volumes and capacity growth. Also, the velocities in this section exceed 45 MPH; this is an engineering concern as well.
Finally, because this section of pipe is older, there is increased danger of corrosion in the pipe wall and at the welds. Also, since this area of the pipe was never designed for these pressures, there are some valid safety issues, including the thinness of the pipe walls. Islander East will very likely need to upgrade this by laying new pipe soon after coming on line regardless of any future anticipated increase in capacity. In addition, because of the thickness of the pipe, the Islander East pipeline will be more susceptible to accidental or purposeful damage by earthmoving equipment or terrorist activities. Iroquois uses a thicker grade of pipe because of the higher operating pressures as required by safety provisions of the DOT.
Thus, the area from Cheshire to North Haven will require looping or the installation of new pipe with additional future increases in capacity. Moreover, even without any future increase in capacity, Islander East may still have to lay new pipe or loop for safety/engineering reasons because of the increase in pressure that this project requires.
As an example of alternative engineering designs, consider Iroquois' upland line. This pipe has a considerably thicker wall - often considered impenetrable by normal standards - and it is wrapped in concrete. In addition, where Iroquois crosses under railroads etc., even thicker pipe is used.
In addition, the Islander East proposal supplies gas to Long Island at 366 PSI. Please note that the Iroquois proposal supplies gas to Long Island at 700 PSI. The two power plants that Islander East has precedent agreements cannot operate at a continuous gas supply of only 366 PSI; power plants require the flexibility to produce electricity at different rates throughout a 24 hour period, depending on demand. Both power plants will likely require a higher level

of PSI, maybe even 550 to 600 PSI, for at least several hours per day.
Nevertheless, this means that in order for Islander East to meet their contractual obligations, compressor stations will need to be built either on Long Island at each power station or here in Connecticut. Perhaps the compressor stations will be part of the proposals for the power stations. However, these compressor stations still need to be reflected in the environmental scoping for the Islander East project. The FERC should be obligated to include this in the overall environmental scoping for this project. At the very least the question of a new compressor station on the Connecticut side of LIS must be clarified. In sum:

" Islander East will need to do looping or lay new pipe by as early as November 2004 and as late as November 2005 in order to meet their market predictions and contractual obligations.

" The looping in the North Haven through Branford section should have been included in the FEIS. The looping should be done when the new pipe is first laid in order to minimize further environmental degradation i.e. the construction right of way will have just started to grow back when it will have to be cleared again.
" In the area of the 13.3 mile Cheshire to North Haven section, Islander East may need to lay new pipe and/or do looping because of new engineering and safety issues created as a result of the construction of Islander East and the greater pressures that this project requires compared with what the original Algonquin system was designed for.
" Additional compression will need to be created for the two power plants Islander East proposes to serve - either at the site of the power plant or in Connecticut. This is an impact that should have been included in the FEIS; otherwise this is a misapplication of the "four factor test."
" Since it takes at least 18 months for an application to be processed and construction to occur, and since we are now 18 months away from November 2004, where are Islander East's application for looping/pipe replacement and additional compression? These applications to FERC should have been part of the current application so that the full environmental impacts could have been assessed by the FEIS.
Islander East should immediately disclose any plans to do looping/lay new pipe along the Cheshire to North Haven section and to include this as part of the scoping for this project. Islander East must also disclose if they will require an additional compressor station in Connecticut on order to service either/both of the two power plants, AES and Brookhaven, although since neither plant requires Islander East gas, this may be moot.
In sum, Islander East has not provided the full scoping for their project and by doing so has minimized the full environmental impact in a misleading way.

Subject: Word Doc Pasted into E-mail: Part 2
Resent-From: Islandereast.Comments@noaa.gov
Date: Thu, 15 May 2003 23:54:38 EDT
From: <KKennedyMD@aol.com>
To: IslanderEast.comments@noaa.gov

The CT Department of Environmental Protection's Determination

I would like to underscore how grateful we are to Commissioner Arthur Rocque and the Connecticut Department of Environmental Protection (CT DEP) for using the CZMP on October 15, 2002 to halt the Islander East Pipeline Project. As you are aware, Commissioner Rocque stated that the CT DEP "has determined that the activities, as proposed, are inconsistent with Connecticut's CZMP" and that "the proposed work would cause significant adverse environmental impacts on coastal resources."

Commissioner Rocque listed the impacted coastal resources:
" Water quality will be degraded in Long Island Sound.
" Tidal wetlands will be adversely impacted.
" The pipeline will "degrade, irrevocably alter and permanently destroy essential shellfish habitat â€¦which cannot be mitigated."
" "By placing the pipeline through commercially important shellfish habitat and irrevocably altering that habitat, a water-dependent use will be permanently replaced with a non-water dependent use."

Commissioner Rocque concluded: "The proposed pipeline has not been properly planned and controlled and if installed, will adversely affect the quality of the environment in derogation of CGS [Connecticut General Statutes] section 16-50g."

We concur with Commissioner Rocque's determination.

I would like to highlight some of the areas of environmental concern. Because the FEIS is incomplete, many of these issues still have not been addressed. In part, this is because FERC relied on the applicant as primary source for studies conducted. Clearly further examination of these areas is still warranted.

In the following section, I will give examples of how the proposed Islander East Pipeline will affect the impacted coastal resources as described by Commissioner Rocque. The final section will address national interest concerns.

Impacted Coastal Resources

Concern 1: Shellfish Habitat and Water Quality
I will address these two concerns together, since often they are connected.

A.
Late successional stage communities, especially in the deeper areas of LIS, will take as long as 10 years to recover, and even longer if conditions are not ideal. This loss will impact LIS water quality and marine organism's habitat.

Many benthic species, especially the ones in the deeper parts of the Sound, belong to a community that has been defined as being a late stage community (Rhoads, 1978). Such communities develop over the course of many years and only if the conditions are right. These communities are not adapted to frequent disturbance and, as a result, are hard hit by physical disturbance.

In LIS, these communities may take anywhere from 3 to 10 years to fully establish themselves (Rhoads and Germano, 1983) under ideal conditions. If conditions are not ideal, as described below, these late stage communities may never re-establish themselves. This impact is long-term not short-term.

B.
Barge anchoring and cable sweep impacts will form anoxic depressions that will not fill in naturally and will have long-term and possibly permanent impacts which will impact LIS water quality and marine organism's habitat.

Since the anchors will not be placed in the exact same spot on every pass, there will be the creation of a significant number (2,628 according to the FEIS) of large (20' x 8.6' x 8' deep) anchor scars running parallel to the pipeline site for the width of LIS. According to the Essential Fish Habitat Assessment contained within the FEIS, the width of the

impacts from the anchor scars will extend out "approximately 2000 feet to either side" of the pipeline.

The anchor scars, together with the impacts of the cable sweeps, despite some mitigation by mid-line buoys, will create an area of disturbance 4000 feet wide across the seafloor along the entire 22.6 mile pipeline route. Thus as much as 477,312,000 square feet or 10,958 acres of LIS seafloor will be impacted by the construction of the pipeline.

These anchor scars are physically, chemically and biologically analogous to other anthropogenically created depressions in the floor of LIS, such as borrow pits that exist in the central and western areas of LIS; both represent new depressions in the seafloor. These new depressions in the floor of LIS have the potential to alter the local hydrodynamics present in the area. For example, borrow pits are known to accumulate fine-grained sediments and organic materials (Swartz & Brinkhuis, 1978). The sediments that accumulate in borrow pits are usually more organic rich than the surrounding sediment and are typically hypoxic or anoxic; thus they attract a different type of benthic community.

The creation of a series of anoxic depressions in Branford will significantly alter the normal geochemical environment over the entire Pine Orchard-Stony Creek region, especially in the summer. Whereas areas of the Sound to the west of Branford have experienced severe seasonal oxygen depletion, Branford has not (DEP).

The creation of hypoxic and potentially anoxic spots in an area not known to have them presents a significant problem that needs to be addressed. Hypoxic areas, while known to attract bottom-feeding fish because of the abundance of small polychaete worms, like Capitella, are not favored by most macrobenthic organisms, including oysters, lobsters, crabs, hard clams, razor clams, mussels, scallops, and horseshoe crabs.

Additionally, long-term exposure to hypoxia is detrimental to most finfish and their larvae. In essence, the anchor scars will create permanent degraded areas within an otherwise stable, healthy community critical to the overall functioning of the deeper parts of LIS.

C.
The anchor scars, left unfilled, will become hypoxic/anoxic areas that will be colonized with organisms different from those prior to the laying of the pipeline. This will impact shellfish and water quality.

While it is true that some local migration of fauna may occur from adjacent undisturbed sediments, it is highly unlikely that recruitment of the same species that existed prior to the disturbance will occur at the site unless the community was in a very early stage of development. In the deeper areas of the central basin of LIS, most of the communities are later stage.

There are other mitigating factors that affect larval availability and recruitment, including time of year, condition of sediment, presence or absence of larval settlement cues, presence or absence of contaminants (such as bentonite), and levels of water column and sediment dissolved oxygen. Additionally, it is highly unlikely that these areas would ever recover a significant shellfish community if they remain as basins where fine-grained sediments are accumulating.

Recolonization of this 4000 foot wide area will occur mainly from the water column and not from adjacent areas. Only the extreme margins of this impacted area are likely to be recolonized by migrating benthic organisms, as the majority of the region will be affected, leaving undisturbed regions a significant distance away from the central trench.

Larval recruitment from the water column will depend on the season of the year and the presence of particular larval species. It is most likely that small polychaetes, like Capitella sp., would recruit to the area (Rhoads, McCall, & Yinst, 1978). These organisms are part of a community identified as an early colonizer and do not form a significant part of the later stage community that is normally present. The communities formed by early colonizers are vastly different in their function from later stage communities. Capitella are often used as pollution-indicator organisms as they are known to be able to tolerate extremely low levels of oxygen and can exist in the presence of hydrogen sulfide, ammonia, and other reduced end-products of organic matter decomposition.

D.
Pipeline construction will be a major disturbance to water quality from both the sedimentation from construction and the potential impacts from hypoxic and anoxic waters within the anchor scars.

Furthermore, the LIS area east of New Haven has been noted to have consistently higher water quality than areas west of New Haven. Islander East's pipeline would be negatively impacting an area of LIS that is considered to be a

healthier area that makes significant contributions to overall LIS water quality. In general, according to the U.S. EPA, the water quality in LIS has undergone significant improvement over the past 10 years and is expected to continue to do so. Anthropogenic point sources of nitrogen have and are in the process of being controlled and there are a number of programs in place that are educating the public about controlling non-point source inputs of pollution to the Sound.

LIS is becoming healthier and should not be exposed to the burden of additional pipelines and cables, especially in the eastern half.

E.
Furthermore, anchor scars, if left unfilled, would become hot spots for heavy metals and other contaminants that will increase the risk of bioaccumulation and exposure to humans and further compromise water quality and shellfish health.

Fine-grained sediments, such as the kind that will tend to accumulate within the anchor scar pits, act as scavengers of heavy metals and other water-borne contaminants. Areas where they accumulate, such as anchor scars and borrow pits, tend to become localized hot spots for contaminants.

These heavy metals have the potential to bioaccumulate in the tissues of the polychaete worms and other small infauna living within these sedimentary pits. These organisms, in turn, are fed upon by demersal fish, such as flounder, which further bioaccumulate the heavy metals and continue to move them up the food chain, potentially reaching humans.

F.
The area might recover more quickly if the anchor scar pits are filled immediately with clean fill; leaving the anchor scars unfilled will further degrade LIS water quality.

If the anchor scars are not filled and are allowed to fill in "naturally", they will be filled with fine-grained sediment, will tend to become organic rich and will be colonized by species like Capitella that can tolerate hypoxic and anoxic conditions. It is unlikely that these areas will ever progress to the healthier later stage communities. This will add to the overall problem of hypoxia and anoxia that the central and western areas of LIS have been coping with and will contribute to greater finfish morbidity and mortality.

The area might recover to a pre-construction profile if the anchor scar pits are filled immediately with clean fill, such as that used to cap the Central Long Island Sound disposal site (USACE, 1990).

G.
A Horizontal Directional Drill (HDD) technique will be used to install this pipeline underneath 4000 feet of shellfish beds ostensibly in order to minimize environmental impacts. However, the HDD process will simply create new negative environmental impacts to the local benthic communities.

We still do not have the final report from Dr. Frank Bohlen who served as a paid consultant to Islander East. Islander East switched consultants close to the time that Dr. Bohlen had promised his report. We are concerned that his results (although suspect because he was paid to do the study) were never released because the findings were not to Islander East's liking.

According to the FEIS, "approximately 1,230 cubic yards of bentonite and 760 cubic yards of native rock cuttings could be released to the Sound over the 3-month drilling period." The impact of drilling muds to water quality could be hazardous. Adams (1978) has reported that drilling fluids released at a site can be found covering sediments to a depth of 1 mm several kilometers away from the initial discharge site. The discharge of the high volumes of bentonite and other drilling muds, both planned and unplanned, from the exit hole and along the planned route will cause significant turbidity and siltation over a large area; The resulting environmental impact will be long-term and potentially irreversible.

Islander East still has not designed nor tested a mitigaton plan in place for containment of these drilling muds. Without containment the bentonite will flocculate upon exposure to the saline water of Long Island Sound (LIS) and will fall onto adjacent shellfish beds, thereby suffocating them with the excessive siltation. A containment model to prevent any planned release must be developed and must address weather, thermocline and halocline stratifications; furthermore, substantive testing of this model must be completed. This model however, could not address any unplanned releases which may occur -- as happened during the installation of the Cross Sound Cable -- and the subsequent environmental degradation.

The release of bentonite has potentially deleterious effects since even only 1 to 2 mm of clean bentonite will interfere with postlarval lobsters' ability to burrow. Lobster populations in LIS have already been significantly depleted for a variety of factors including hypoxic/anoxic conditions and disease. The release of this volume of bentonite will add further to lobster morbidity and mortality.

Atema, et al. (1982) have demonstrated that the physical effects, alone, of drilling muds are capable of interfering with postlarval lobster survival. Cuomo (personal communication), the author who conducted that part of the study, has stated that even a 1-2 mm layer of clean bentonite-barite clay was enough to impact the ability of postlarval lobsters to effectively burrow into the sediment.

Postlarval lobsters exposed to 4 mm-deep layers of the clean clay mixture had serious problems digging shelters, and a significant number of them were not able to construct adequate shelters at all. Inability to successfully burrow into the sediment and construct adequate shelters results in an increase in predation susceptibility.

Therefore, it is likely that the release of drilling fluids of any kind into the Sound can have a deleterious effects upon the one and two year classes of lobsters in the vicinity.

At a distance of 4000 feet, this HDD operation is one of the longest -- if not the longest -- HDD route that has an exit point underwater in the seafloor. A successful drill will require optimum conditions and is technically challenging. Several attempts are possible. If repeated attempts fail, Islander East would resort to conventional trenching for the 4000 feet; this would be unquestionable devastating to several hundred acres of shellfish beds that would be impacted.

No onshore clearing, construction or blasting should commence until the full HDD activity has been completed and determined to be successful. If the HDD is not successful, the project cannot continue with traditional trenching/plowing in the near shore waters of Branford.

Since no HDD activity is required for any of the alternative routes, the need for an HDD makes this route significantly less feasible than an alternative route that does not require HDD.

The trench required at the exit point of the HDD would be open for 3 months and would contribute to ongoing sediment suspension and siltation, especially during winter storms and Nor'easters.

The HDD will operate at 85 decibels with mitigation to 60 decibels for 24 hours per day for at least a 3 month period. This will occur adjacent to a residential community where decibel zoning is far lower. The HDD noise may impact both humans and wildlife, depending on the effectiveness of the mitigation techniques. Furthermore, local harbor seals may be affected by the noise. Acoustic testing to determine if marine mammals will be affected must be performed by a third party prior to construction; based on that testing the filing for the appropriate permits under the Marine Mammal Protection Act must be completed.

H.
The geochemistry of Long Island Sound (LIS) has not been addressed. Any trenching/plowing activities will significantly negatively impact the local LIS geochemistry. This will harm local benthic communities.

Not enough consideration has been given to the major impact that trenching/plowing will have on the release of contaminants, including heavy metals, from the sediments of LIS.

For Long Island Sound, there exists an additional important structuring feature on the benthos in addition to those (e.g. sediment characteristics, geomorphology, and hydrodyamics) mentioned by Zajac, et al. (2000). This -- one of the most important structuring feature for soft-sediment communities, especially for temperate urban estuaries like Long Island Sound -- is the geochemical state of the sediments and the water column. Numerous papers have been written stressing the relationship between benthic community types and the geochemistry of an area (Rhoads & Germano, Cuomo,) yet little to no geochemistry has been addressed within the FEIS or the Preliminary Sediment Study conducted by Islander East's consultant, Frank Bohlen, PhD, specifically as it relates to the cycling of organic matter, the development of hypoxic and anoxic sediment pore water and bottom water conditions, its influence on macrobenthic community development, and its relationship to the release of sediment contaminants under changing redox conditions.

Any trenching/plowing activities will release heavy metals and other toxic contaminants (sulfides and ammonia) into the water column; this significant process is not addressed.

In much of central and western LIS, the organic rich and fine-grained sediment tend to anoxic and hypoxic pore

water conditions; these conditions can begin at the LIS floor to 10 cm below the surface (personal communication Cuomo.) Under anoxic conditions, the majority of metals and other contaminants remain bound to particles and are unavailable (Khalid, et al, 1978). When trenching/plowing occurs, the anoxic sediments will come into contact with oxygenated water and result in a release of the bound heavy metals and other contaminants into the water column where they will become biologically available (Khalid, et al., 1978).

These heavy metals have the potential to bioaccumulate in the tissues of the polychaete worms and other small infauna living within these sedimentary pits. These organisms, in turn, are fed upon by demersal fish, such as flounder, which further bioaccumulate the heavy metals and continue to move them up the food chain, potentially reaching humans.

Furthermore, accompanying the release of metals and other contaminants from organic-rich sediments into the water column will be a release of several reduced chemical species, including hydrogen sulfide, ammonia, and methane.

Sulfides are known to be toxic to most organisms at varying concentrations.

Ammonia has been shown to cause deleterious effects in lobsters at even very low concentrations in the marine environment (McLeese,1970.)

Sediment resuspension will also lower the level to which PAR (photosynthetically active radiation) can penetrate. Sediment resuspension will also cause problems, such as clogging, for filter-feeding organisms like oysters and other bivalves.

A full and detailed geochemical analysis - independent and not paid by Islander East -- still needs to be performed prior to any LIS activities. This would include but not be limited to a heavy metals and contaminant analysis with special attention to the availability and mobility of heavy metals and other contaminants in the area under both anoxic and normal dissolved oxygen conditions. A mitigation plan must be developed.

Benthic sampling by Dr. Pellegrino was substandard and inadequate: repeated standardized sampling needs to be done. The inadequacy of this data supports concerns about all data obtained from non-independent consultants i.e. those paid by the applicant as well as raise specific concerns about the accuracy of benthic communities mapping.

In the Long Island Sound Sampling, Analysis and Study Plan that was submitted to the Connecticut Siting Council, the methods used by Pellegrino are not consistent with the EPA Protocols for even a Tier I minimal biological assessment of marine soft-sediment communities (EPA, 2000), and certainly inadequate for a higher level of assessment of a system such as central LIS. Pellegrino used a 1.00 mm mesh screen to characterize the benthic fauna in the region of interest. Standard scientific and EPA protocols for such studies require the use of a 500 um sieve or finer in order to accurately characterize the benthos of LIS.

Zajac et al. (2000) state that, "the regional distribution of benthic communities in LIS reflect the influence of processes which shape the sedimentary environments. At the core of these dynamics is the interaction between sediment characteristics, geomorphology, and hydrodynamics and the resulting influence on the ecology of the benthic organisms via dispersal and settlement, resource availability and feeding, and modifications of local habitat conditions." The authors go on to state that, "At the present time, we have a basic understanding of the spatial distribution of soft-sediment communities in LIS and the possible range of infaunalâ€¦many portions of the LIS seafloor have been sampled only once to characterize benthic communitiesâ€¦therefore, it is difficult to assess their temporal dynamics. Consistent sampling over time is especially critical for detecting long-term trends and for assessing changes that may result from management activities". These statements clearly point up the inadequacy of the FEIS with regards to benthic community analysis and understanding.

In addition, Zajac, et al. (2000) makes it clear that the dynamics of the marine invertebrate environment in LIS are highly complex. Changing one variable in the system will have an impact on the biota in the region. This is especially true for LIS, yet the studies provided by the consultants to Islander East and the DEIS never address this, especially when it comes to the changes in the local hydrodynamic and chemical regime that will be produced by the anchor scars.

Further studies to adequately characterize the system are required.

J.
The soil and groundwater adjacent to the Tilcon Railroad need to be tested for petroleum and heavy metals

contamination, especially in wetlands and at the HDD entry point.

Zinc, mercury chloride, creosote and other potentially toxic materials have been used to treat railroad ties. These materials can leach out of the ties and into the surrounding soil and then into groundwater.

The Tilcon RR was first laid in 1905, prior to regulations regarding these contaminants.

There is concern that the digging of six foot trenches in potentially contaminated soil order to lay the pipeline can unearth these contaminants. This is a particular concern along wetlands, stream crossings and the near shore LIS area because of impacts to water quality. In addition, if soil adjacent to the entry point of the HDD contains contaminants, this could further contaminate LIS when the HDD exits in LIS.

The potential for contaminated soil/groundwater requires testing by an objective third party, not a consultant paid by Islander East.

K.
Concerns about contaminated groundwater exist. Pipeline placement could risk further contamination of surrounding aquifers.

According to the DEP, in the area of the Hartt property at MP 5.5 a tetrachloroethene (PCE) plume exists on the bedrock aquifer; a letter dated October 22, 2001 from Jonathon Goldman of the DEP states "any blasting that occurs within the area of the contaminant plume can have a direct effect on the contaminant migration in the bedrock aquifer."

Rizzo Associates has described the bedrock in this area as "fractured and complex in nature" and advised the DEP that no further "disturbance" occur in order to prevent any migration of the PCE plume into the adjacent aquifer.

Clearly, no blasting can be allowed in this area.

L.
Significant stores of methane gas have been identified offshore Branford in LIS. If the pipeline route disturbs this reservoir there will be the risk of methane gas release into LIS with resultant contamination and impacts to water quality. Identification of these gas reservoirs must be addressed prior to pipeline construction.

Further tests for methane gas must be done by the DEP OLISP or USACE along the route of the pipeline on the LIS seafloor. If the pipeline route does traverse these areas, a mitigation plan for containment must be developed and fully tested.

M.
The potential impact to the horseshoe crab has been ignored in the DEIS. It should also be noted that the horseshoe crab, Limulus polyphemus, which the Atlantic States Marine Fisheries Commission has developed a management plan for (Schrading, et al., 1998) because of the severe decline in population numbers of this animal over the past ten years, lives in the deeper waters off of Branford and New Haven harbors.

Horseshoe crabs come ashore to mate in great numbers in late May and early June and in smaller numbers throughout the rest of the summer. These organisms play critical roles in the life histories of migrating shorebirds; their recent decline has made protecting their spawning areas of vital importance.

N.
Placing the pipeline in LIS will have a negative impact on finfish and shellfish year-round.

LIS has many species that require special consideration, especially during vulnerable periods of spawning, larval development and migration.

For example, lobsters hatch in May through October; horseshoe crabs spawn in May and require special conditions in their nursery habitats; Harbor seals haul out on the Thimble Islands from November through March; January to May are the spawning periods for winter flounder; February to November are the spawning months for window pane flounder. Benthic communities spawning has been earlier and earlier every spring in LIS, some as early as mid-March.

O.
Although the bald eagle does not nest near the proposed project area, the bald eagle has been seen and

photographed wintering over and roosting in the marshes adjacent to the lower Quinnipiac River, in Hamden Connecticut and on Lake Gaillard in North Branford, Connecticut. A "Rare Bird Alert Form" of this finding is in the process of being filed with the New Haven Bird Club.

As listed species, any damage to the habitat and food sources will have an impact on these populations. For example, if there is an increase in heavy metals and other contaminants in LIS and there is bioaccumulation up the food chain, this could impact the reproduction of species such as birds of prey like the bald eagle. Although the piping plover nests several miles away on Falkner's Island, it forages for food within the pipeline route. Destruction of the habitat that is the source of food for the piping plover could have implications for its populations.

The pipeline could impact the food sources and habitat of the bald eagle, least tern and piping plover.

Subject: Word Doc Pasted into E-mail: Part 3
Resent-From: Islandereast.Comments@noaa.gov
Date: Thu, 15 May 2003 23:55:38 EDT
From: <KKennedyMD@aol.com>
To: IslanderEast.comments@noaa.gov

Concern 2: Tidal Wetlands
A.
Although 22.1 acres of wetlands will be degraded for the construction right-of-way, some of this will not fully recover and so it is expected that the permanent net loss of 3.1 acres of wetlands as listed is an underestimation of total wetlands loss.

Any loss of wetlands is a significant impact to the water quality of LIS.

B.
The pipeline will promote the spread of invasive species and unless a mitigation plan is developed, native species will not be conserved; wetlands are especially at risk. For example, Japanese knotweed is an especially virulent invasive species because it is capable of self-propagation from even a small cutting. Therefore, these plants, if located in the area that Islander East is clearing will need to have a specific plan for disposal in order to minimize their further invasion into natural habitat. Otherwise there will be additional impacts to the overall ecosystem.

Concern 3: Water-Dependent Use
The current preferred route to locate the pipeline across a federally maintained marine channel and through valuable shellfish beds ignores alternatives that would create less environmental degradation and public safety risk and substitutes a non-water-dependent use for a water-dependent use of the area.

Not only would Islander East impact substantially more shellfish beds than the ELI Systems Alternative (as described in the FEIS), the route of Islander East crosses Long Island Sound (LIS) at nearly its widest point. Although this may be less expensive for Islander East, it is much more environmentally damaging to LIS. Islander East would impact 22.6 miles of LIS seafloor whereas the ELI Systems Alternative would impact only 17.1 miles.

Since the area impacted along the route will be 4000 feet wide - from impacts to the seafloor from anchor scars and cable sweeps -- this is a significant 5.5. miles which will cost the LIS seafloor potentially as much as 2437 acres. (This calculation assumes that Islander East will impact 10,771 acres of LIS seafloor while the ELI Systems Alternative will impact only 8291 acres; the ELI Systems Alternative will save 2437 acres of LIS seafloor from impact.)

In sum, Islander East would essentially be the substitution of a non-water dependent use of the area for two water-dependent uses, shellfishing and marine transportation. In the event of a pipeline rupture, these water-dependent uses could be even more severely compromised.

National Interest
These are divided into Public Safety Risks and Economic Need.

Public Safety Risks:
A.
The area around Branford is seismically active and Islander East would pose a public safety risk in the event of a pipeline rupture.

Varekamp, Thomas, and Thompson (2000) reported on the presence of an active fault line running between the Farm River in Branford and Kelsey Island. Their studies, including radiocarbon dating and sediment analysis, showed a historic pattern of upwelling in the Kelsey Island marsh followed by substantial (average magnitude 4-5) earthquakes. The earthquakes have occurred about every 200 years over the past 1,200 years. The last significant earthquake to occur in the area took place in 1791, a little over 200 years ago and registered a magnitude 4.4 on the Richter scale. Varekamp, et al.'s (2000) study indicates that, at the present time, the Kelsey Island marsh is once again undergoing upwelling. Therefore, the potential for seismic activity in the area is significant, especially if blasting is to take place.

In addition, the Eastern Border Fault runs beneath the Sound in the vicinity of Branford, contributing to the risk for pipeline rupture during an earthquake with resultant LIS contamination.

Further study of the potential for seismic activity and the risk to public safety is indicated.

B.
The Islander East Pipeline would cross the Tilcon Marine channel that is periodically dredged with a U.S. Army Corps of Engineers permit.

The Tilcon Marine Terminal is an active port with many barges entering and leaving daily, loaded with traprock. These barges do occasionally capsize in heavy weather and for other reasons. The location of this pipeline across this marine channel creates a substantial public safety risk for a pipeline rupture in the event of a barge overturning- especially one loaded with tons of rock material.

A rupture would result in contamination of the waters of LIS and would degrade and even destroy adjacent shellfish beds. A rupture in this area also presents a severe threat of human morbidity and mortality, especially for Tilcon workers, tugboat pilots and local area residents.

C.
The Islander East pipeline would also be sited adjacent to the Branford Steam Railroad for several miles. The Branford Steam Railroad carries literally tons of traprock to the Tilcon Marine Terminal. These trains have been known to derail.

The location of this pipeline adjacent to this railway creates another substantial public safety risk for a pipeline rupture in the event of a train derailment - especially one loaded with tons of rock material.

Tilcon and the Branford Steam Railroad have expressed great concern and have stated in a letter submitted to the CT Siting Council that "this pipeline cannot co-exist in the same right-of-way as the railway."

The safe operation of the railway and the marine terminal are severely impacted by this pipeline location.

D.
Furthermore, Tilcon -- in service for nearly a century while providing jobs and tax dollars to the community -- could be severely financially compromised by this pipeline in the event of a rupture.

E.
Islander East runs within 25 feet of a playground of a small private non-profit school. This compromises the safety of the 75 or so children that attend this school as well as compromise the school's economic survival in difficult economic times: parents can choose to send their children to other schools where there is no pipeline risk.

F.
Since September 11, 2001, the world has changed: terrorism is, unfortunately, part of our experience and one that we must prepare for. In the late fall of 2001, newspapers carried stories of threats by Osama bin Laden that he was targeting natural gas pipelines, especially those in the Northeast.

Islander East would run through backyards, next to swingsets and patios. It would cross Long Island Sound, an estuary that provides millions of people with food, recreation and goods through marine transport.

It is simply irresponsible to construct another target for terrorism: the potential destruction by terrorism of a high pressure natural gas pipeline across Long Island Sound would harm water quality and marine life for decades, if not irreversibly.

Economic Factors
" As detailed in the Background area above, the energy/economic need for Islander East is questionable.
" Moreover, the expense of this additional infrastructure will simply be passed to the Long Island ratepayer, which in this economy, is an additional burden to bear.
" Islander East provides no apparent economic benefit to Connecticut
" The primary benefactor of Islander East will be the co-investing corporations, Duke Energy and KeySpan Energy, which stand to profit at the environmental losses to Connecticut and the economic losses to New York.
" Islander East will cost more than alternative routes or other projects and this will impact ratepayers in New York and possibly Connecticut.

CONCLUSION

Islander East's pipeline would irrevocably degrade the small, yet unique and significant, open space areas along its route. These areas can never be replaced. Thus, sadly, an area of great natural beauty and significance as well as a recreational source for the public would be lost. Islander East refuses to consider alternative routes that are less environmentally damaging.

Islander East's route is indeed inconsistent with the CZMA. Islander East would create severe adverse and long-term impacts for Long Island Sound and its coastal areas. In addition, Islander East would create significant public safety risks and unnecessary burdens for the ratepayer.

We respectfully request that the Department of Commerce, through NOAA, please uphold the determination of the CT DEP and disallow the appeal from Islander East.

I very much appreciate the opportunity to comment on this appeal. Please do not hesitate to contact me for further information or clarification. I can be reached at the address below or by telephone at 203-772-2090.

Respectfully submitted,

Katherine Kennedy, M.D.
Spokesperson, CT Stop the Pipeline
Post Office Box 578
Branford, CT 06405

References:

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Subject: I oppose the Islander East Pipeline
Resent-From: Islandereast.Comments@noaa.gov
Date: Thu, 15 May 2003 19:48:33 -0700 (PDT)
From: Chris Sullivan <sulldaddy@yahoo.com>
To: IslanderEast.comments@noaa.gov

Dear Secretary Evans:

I am writing to you to oppose the Islander East pipeline project. I have stated my opposition numerous times and will again in this email.

My opposition grows from many sources. The pipeline will give no economical or resource benefits to the state of Connecticut yet it will damage many pristine habitats in our coastal areas. How can any citizen of Connecticut support such a project.

Secondly, I oppose the Islander East proposal on grounds that it will violate the Marine Mammal Protection Act of 1972. There are harbor and grey seals in the areas proposed to be drilled for pipeline construction. These creatures are very habitual and territorial and will stay in very specific areas. These seals are also very cautious around and afraid of humans. Many of the seals that reside in the Branford area of Long Island Sound will be nursing pups during the proposed drilling times. The decibel level of the drilling will most likely scare and disturb the local seal population. Nursing mothers have been know to abandon their pups when disturbed, the majority of abandoned pups will die.

The Marine Mammal Protection act defines harrassment as "disturbing the breeding, feeding, breathing, nursing or other aspects of any marine mammal activities." Islander East has not applied for a permit for this type of harrassment. I do not believe that this permit should be given to the project.

In the town of Branford there is a company that provides a service to take people on tours of Long Island Sound, in particular with seal viewing in mind. If the proposal goes through and disturbs and/or harrasses the seals as I am sure it will, this company will no longer have a source of livelihood. As a leader in the area of commerce I am sure you would not wish to see local businesses shut down by a project.

Thank you for your time and I urge you to vote NO on the Islander East Pipeline proposal.

Sincerely,
Chris Sullivan
49 Silver Street
Branford, CT 06405

=====
"The world contains enough natural resources to satisfy the NEEDS of mankind, but not enough to satisfy the WANTS of mankind"
---Mahatma Gandhi

Subject: Re: Appeal by Islander East Pipeline Do. LLC
Resent-From: Islandereast.Comments@noaa.gov
Date: Thu, 15 May 2003 17:17:56 EDT
From: <CTSeafoodCouncil@aol.com>
To: IslanderEast.comments@noaa.gov

Dear Secretary Evans:

We strongly oppose the proposed Islander East Pipeline Project. We respectfully ask that you deny the appeal by Islander East as CT's DEP has determined that the project is not consistent with CT's Coastal Zone Management Plan.

The proposed route for this pipeline is uniquely spectacular. I have walked the route and have been enthralled by its beauty. Adjacent wetlands with their great blue herons; Long Island Sound, with its aquatic life and shellfish beds; the path along the railroad tracks - none should be disturbed. The proposed pipeline would be a violation of the trust for which we are responsible. Our children and grandchildren deserve no less.

Please deny the Islander East appeal - and help us preserve the sanctity and beauty of one of the most unique natural areas in Connecticut.

Thank you.

Sincerely yours,

Barbara Gordon
Executive Director
CT Seafood Council

Subject: **IslanderEast Comments. I'm against them putting a pipeline in through Branford, CT.**
Resent-From: Islandereast.Comments@noaa.gov
Date: Thu, 15 May 2003 10:00:11 EDT
From: <Ajhaug@aol.com>
To: IslanderEast.comments@noaa.gov

Re: Appeal by Islander East Pipeline Company, L.L.C.

Dear Secretary Evans:

I am writing to express my strong opposition to the proposed Islander East Pipeline Project.

I am writing to ask that you deny the appeal by Islander East and support the determination by the CT DEP that this project is not consistent with Connecticut's Coastal Zone Management Plan.

(this area is where you can quickly personalize -- the idea is to give Commerce a sense of the uniqueness and beauty of the area through your eyes, through your activities, whether you walk the Nature walk or fish in Long Island Sound. You could write something like the following:
I have lived in Branford for many years. I enjoy walking the Nature Trail where the pipeline would go. The pipeline would degrade adjacent tidal wetlands where I like to look for Great Blue herons. These areas are beautiful, unique and rare. If degraded there is no adjacent land that could be used to make up for the loss. Please do not allow Islander East to destroy this beautiful area with its right-of-way.

Plus, I'm concerned about safety issues with a pipeline running through our town.

Please ensure that Connecticut's coast and the waters of Long Island Sound are preserved and protected for future generations. Please deny the appeal by Islander East.

Sincerely yours,

Eunice Ruth Mahler
202 Harbor
Branford, CT 06405

Subject: Denial of Islander East
Resent-From: Islandereast.Comments@noaa.gov
Date: Thu, 15 May 2003 09:53:57 -0700 (PDT)
From: Mark DeFelice <markdcpa@yahoo.com>
To: IslanderEast.comments@noaa.gov

May 14, 2003

Re: Appeal by Islander East Pipeline Company, L.L.C.

Dear Secretary Evans:

We are writing to express our strong opposition to the proposed Islander East Pipeline Project.

We are writing to ask that you deny the appeal by Islander East and support the determination by the CT DEP that this project is not consistent with Connecticut's Coastal Zone Management Plan.

We are **AGAINST** the proposed Islander East Pipeline Company gas pipeline that is going through Connecticut and Long Island Sound. Please do not let BIG business and politcal pressure rule over our precious environment.

Thank you for your concern.

Mark & Deborah DeFelice

Subject: Appeal by Islander East Pipeline Company, L.L.C.
Resent-From: Islandereast.Comments@noaa.gov
Date: Wed, 14 May 2003 11:41:52 -0500
From: Bob Crelin <bcrelin@rcn.com>
To: <IslanderEast.comments@noaa.gov>

Dear Secretary Evans:

I am writing you to express my opposition to the proposed Islander East Pipeline Project. I am asking that you deny the appeal by Islander East. Aside from strong opposition from local citizen's and lawmakers, the CT DEP's has already determined that this project isn't consistent with Connecticut's Coastal Zone Management Plan.

I have lived in Branford all of my life and I've watched as much of our natural and scenic areas have been compromised by one or another form of 'progress'(paved over, surrounded by development, etc.) There are precious few of these areas left and the proposed Pipeline threatens to cut right through some of these remaining areas - with the purpose of supplying Long Island with fuel(?)

This project is not justified for impact to the areas it will greatly affect, and we, living in Branford now need to hold on to and preserve what is left for our future.

In the interest of our environment and our future generations, please deny the appeal by Islander East.

Sincerely,

Bob Crelin
137 Damascus Road
Branford, CT 06405
bcelin@rcn.com

Subject: Pipeline
Resent-From: Islandereast.Comments@noaa.gov
Date: Tue, 13 May 2003 15:28:33 EDT
From: <Rosemaryseagull@aol.com>
To: IslanderEast.comments@noaa.gov

Dear Secretary Evans:
I'm strongly opposed to the Islander East Pipeline Project. I'm writing to ask that you deny the appeal by Islander East and support the determination by Ct. DEP that this project is not consistent with Ct.'s Coastal Zone Management Plan.

When I first moved from L.A. to the shore in Branford in 1952, the Sound was very polluted, mainly from the effluences emptied into Ct. rivers by factories. Due to intensive legislation and serious enforcement, the Sound is cleaner today than I've ever seen it. I now live at the mouth of the Branford River, a beautiful spot. I work with the Branford River Project in our efforts to maintain pollution free tributaries to the river. Naturally I hope to see the river and the coastal area remain clean during the rest of my lifetime and especially during those of my Granddaughters.

All of my neighbors strongly oppose Islander East and the negative effects it will have on the Sound and this lovely coastline.

Thank you for your consideration

Sincerely

Rosemary Booth