

STATE OF CONNECTICUT

DEPARTMENT OF AGRICULTURE

Bureau of Aquaculture and Laboratory



May 28, 2002

Cori M. Rose
U.S. Army Corps of Engineers
New England District
696 Virginia Road
Concord, MA 01742-2751

RE: Public Notice, File Number: 200103091, Algonquin Gas Transmission Company and Islander East Pipeline Company, LLC.

Dear Ms. Rose:

Pursuant to Connecticut General Statutes Sections 22-11d, 26-192 and 192a; staff of the Bureau of Aquaculture has reviewed the above captioned public notice concerning the proposed construction of a 24" diameter natural gas pipeline by Algonquin Gas Transmission and Islander East Pipeline Companies. We have also reviewed the draft environmental impact statement generated by the Federal Energy Regulatory Commission (FERC/EIS-0143D) and application materials submitted to the Connecticut Siting Council and the Connecticut Department of Environmental Protection concerning this project.

We have determined that the siting and the construction methods for the marine phase of the project, will likely cause significant damage and harm to shellfish resources and shellfish habitat. Shellfish aquaculture, commercial and recreational shellfish harvest operations, are likely to be impacted as well. This determination is based on the review of the information provided in the above referenced documents, consultations, as well as staff field experience with a similar project. We therefore recommend that the marine portion of the current application be denied.

Siting Concerns.

The proposed pipeline route is sited in a well known shellfish concentration area that provides habitat for populations of eastern oysters (*Crassostrea virginica*), hard clams (*Mercenaria mercenaria*), soft clams (*Mya arenaria*) blue mussels (*Mytilus edulis*) and channel whelk (*Busycon canaliculatum*). Extensive privately owned shellfish grants, leased shellfish grounds, and public shellfish lands are present. Commercial shellfish aquaculture, transplant and harvest operations occur year round in the area of the proposal. All Branford waters and the offshore areas under the jurisdiction of the Connecticut Department of Agriculture have been classified as Shellfish Growing Areas in accordance with the National Shellfish Sanitation Program and meet the requirements of the U.S. Food and Drug Administration.

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The submerged land through the proposed route that is not currently leased, is a productive marine habitat and is a significant area for future expansion of the shellfish industry.

Construction Methods.

For the marine phase of the project the applicant has proposed to use a combination of construction methods for pipeline installation including horizontal directional drill, mechanical dredge, sub-sea plow or jet sled and possible blasting.

The horizontal directional drill has the potential for frac-out and loss of drilling muds with associated contaminants into the environment causing harm and damage to the shellfish beds and other organisms. Problems frequently occur with the use of this method of construction as experienced on projects in the Housatonic River wetlands, Thames River and most recently in New Haven Harbor (Cross Sound Cable Project). The applicant has indicated a significant amount of drilling mud will be released at the proposed exit pit in the sea floor.

The use of mechanical dredge(s) to create the exit pit and open cut trench in the sea floor will likely cause significant environmental impacts and irreparable damage/alteration of habitat. These alterations of the sea floor profile may render the impacted area unsuitable for commercial fishing and shell fishing. The resultant topographic irregularities may adversely affect the efficiency and safety of the operation and handling of harvesting equipment currently employed by the local seafood industry. The mechanical dredging, handling of spoils, in water storage of spoils and backfilling activities will cause impacts to shellfish resources and habitat due to suspended sediment and sediment transport. Additionally there is a concern regarding the multitude of "scars" and benthic irregularities that will be left in the sea floor caused by numerous sets of anchors and cable sweeps to maintain vessel and barge positions. Suspended sediment and scouring due to prop wash from tugs maintaining position and moving barges is significantly more disruptive than that of the normal boating and harvesting activity that takes place in the near shore area in an around the shellfish beds.

The use of a plow or jet sled for pipe burial through a sea floor corridor of approximately 23 miles, will result in impacts due to suspended sediment, alteration and/or destabilization of the sea floor, and damage or death to marine life.

An additional concern regarding this project and other proposed submarine utility projects, is the potential cumulative impacts to Long Island Sound's habitat, water quality and fisheries. We recommend that whenever possible, the siting and construction of utilities in the estuarine environment be avoided. In review of pending applications and proposed projects, cumulative impacts need to be considered. Alternatives and options regarding energy sources, siting and construction methods should be fully assessed on a regional basis by the regulatory community.

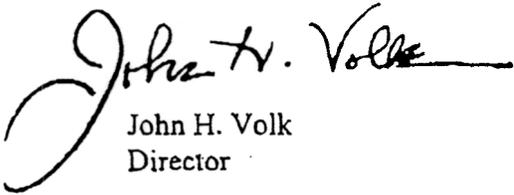


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In summary, we believe that the proposed project for the reasons stated above, will have significant short and long term impact to the marine environment, particularly to the shellfish habitat and shellfish resources within the near shore area.

Thank you for the opportunity to comment. Please contact me if you need any additional information.

Sincerely,



John H. Volk
Director



cc: CT Siting Council
CT Department of Environmental Protection
CT Seafood Council
U.S. Dept. of Commerce, NOAA, NMFS
Federal Energy Regulatory Commission
State Office of the Attorney General
Town of Branford Shellfish Commission



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FAX MESSAGE

DATE: September 5, 2002 # OF PAGES
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TO: Sue Jacobson
DEP - OLISP

FROM: JOHN H. VOLK
DIRECTOR
FAX #: 203-783-9976
TEL. #: 203-874-0696

SPECIAL INSTRUCTIONS: Islander East concerns

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