



ORIGINAL

TOWN OF EAST LYME  
EAST LYME HARBOR MANAGEMENT/SHELLFISH COMMISSION

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P.O. Box 519  
Niantic, CT 06357  
APR 11 2:57  
2006

Chairman  
Donald F. Landers Jr.

Treasurer  
Steven Diamond

Secretary  
Marvin Schutt

March 15, 2006

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

RE: Broadwater Energy LLC, Docket No. CP06-54-000  
Broadwater Pipeline LLC, Docket Nos. CP06-55-000 and CP06-56-000

Dear Ms. Salas:

We are writing in response to the Federal Energy Regulatory Commission's (FERC) February 17, 2006 Notice of Application regarding Broadwater Energy and Broadwater Pipeline (Broadwater). The East Lyme Harbor Management/Shellfish Commission (ELHM/SC) was established by Town Ordinance in 1987, and is authorized to carry out all of the powers and duties granted to harbor management commissions by the Connecticut Harbor Management Act of 1984. Our area of jurisdiction includes the navigable water areas in the Town of East Lyme located in eastern Long Island Sound, CT. As you know, a number of coastal Connecticut communities, including the Town of East Lyme, have adopted resolutions opposing the Broadwater Project because of the potential safety, environmental, and economic consequences of the proposed LNG facility. Our Commission also finds the subject proposal fundamentally inconsistent with the Goals, Objectives, Policies and Water Use Plans and Management Guidelines contained in the East Lyme Harbor Management Plan (1991). We respectfully record our opposition to the Broadwater Project for the following reasons.

**Environmental Impacts:** *Broadwater will have significant deleterious effects on the existing natural resources of Long Island Sound. Benthic habitats supporting rich and diverse populations of shellfish will be permanently impacted by the barge anchors, by the excavation of three-foot-deep trenches in the sea floor for the connector pipe from the barge to an existing gas transmission line 25 miles to the west, and by the effects of increased water temperature related to the re-vaporization equipment. Some marine organisms such as lobsters are very sensitive to temperature elevations and a one-degree rise in average water temperatures can have profound effects on this commercially important fishery. There is also a concern that more invasive non-native species will be carried into the Sound by the LNG vessels coming from natural gas-rich nations in Africa, Asia and the Caribbean. Other environmental impacts include impaired air quality from emissions of the re-vaporization machinery; noise from the barge's turbines and fire protection systems; and effects on other marine organisms.*



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**Recreational Impacts:** The Broadwater Project would permanently alter recreational use of Long Island Sound. Tankers supplying the barge would traverse the Sound with an off-limits zone perhaps two miles ahead of them, one mile behind and a half-mile on either side. The Coast Guard would likely need to close off "the Race" (the narrow channel 7 miles from East Lyme at the Sound's eastern end) when the LNG barges enter. That, in turn, could hamper the operations of submarines from the Groton naval base. The many recreational and commercial fishermen who frequent "the Race" could be temporarily shut out each time an LNG tanker sails into the Sound.

Finally, we understand that FERC staff are working closely with a number of Federal and State agencies (USCG, EPA, USACOE, NYDEC, and NMFS) to review this important application. We also hope that the regulatory agencies from Connecticut are included in the review process to identify all the issues required for a complete and comprehensive Draft Environmental Impact Statement (DEIS). Long Island Sound is a precious national resource enjoyed by millions of U.S. citizens every year. The Broadwater Project represents an expansion of industrial uses on the Sound. Apart from the environmental and safety concerns, carving off any piece of the Sound sets a dangerous precedent and represents the first time waters of Long Island Sound are proposed to be given to a corporation. We appreciate the opportunity to comment on this important matter and look forward to reviewing the DEIS when it is issued.

Sincerely,

Donald F. Landers Jr.  
Chairman

- cc: Governor M. Jodi Rell
- Captain Peter Boynton (COTP Long Island Sound, USCG)
- Andrea Stillman (State Senator)
- Ed Jutila (State Representative)
- Senator Len Fasano (Chair, Long Island Sound LNG Taskforce)
- Gina McCarthy (Commissioner, CT DEP)
- Richard Blumenthal (Attorney General)
- Beth Hogan (East Lyme Board of Selectmen)