

**Comments of Stuart Halper, Trustee of the Village of Briarcliff Manor, New York, on the Millennium Pipeline Project; Public Hearing, November 13, 2002.**

My name is Stuart Halper, and I am a Trustee of the Village of Briarcliff Manor. I would like to make a few comments on alternatives to the proposed pipeline.

Under Department of Commerce regulations, Millennium must establish that "there is no reasonable alternative" to the proposed pipeline that would be consistent with the enforceable policies of New York's coastal management program. (As Mayor Austin mentioned, however,) there are, in fact, several alternatives to Millennium's proposed route across Haverstraw Bay and through Croton-on-Hudson, which would entirely eliminate all the adverse coastal impacts raised by the State of New York.

The Villages of Croton-on-Hudson and Briarcliff Manor have identified no less than nine alternative routes and systems to the Millennium project that would be consistent with the State's program. These alternatives include the use of other existing pipeline systems to ship gas to the New York region; stopping the pipeline at Bowline Point, and a variety of routing alternatives across the Hudson River. The Villages jointly commissioned an alternatives feasibility study prepared by O'Brien & Gere Engineers. The O'Brien & Gere report describes a number of alternatives that involve not only modifications to the routes discussed in FERC's environmental impact statement, but also identifies other routes that are entirely new alternatives that have not been reviewed or evaluated by FERC or Millennium to date.

Of particular interest is a route that would follow the Palisades Parkway south and cross the Hudson River in the area of the existing Tennessee gas pipeline right-of-way. The advantages to this alternative are that it avoids impacting key coastal resources associated with the current

proposal; it makes use of existing rights-of-way and involves less overall upland impacts than the proposed route; it has a shorter crossing of the Hudson River; and it is a shorter route overall.

O'Brien & Gere estimates that this route would actually be *less* costly than the proposed route.

Based on these factors, O'Brien & Gere concluded that this route presents a viable, reasonable alternative to the current proposed route across Haverstraw Bay.

These alternatives are described in much greater detail in the report. We urge the Department to review this study, which the Villages of Briarcliff Manor and Croton-on-Hudson submitted on October 23<sup>rd</sup> as part of our initial written comments in this proceeding.

The Village's joint study makes clear that there are alternatives that are technically feasible to implement, which achieve the primary purpose of the project, whose advantages clearly outweigh its costs. As such, we urge the Department to uphold the State's objection to the current proposed route.

Thank you.