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March 1, 2015

**Docket ID: USCG-2013-0363**

**Agency: Coast Guard (USCG)**

**Parent Agency: Department of Homeland Security (DHS)**

Comments Re: Deepwater Port License Applications: Liberty Natural Gas LLC, Port Ambrose Deepwater Port

I am writing as a representative of the officers and membership of NY4Whales, the New York Whale and Dolphin Action League (ny4whales.org), a 501c-3 non-profit cetacean advocacy organization, and the NY project of Cetacean Society International, who stand opposed to the Port Ambrose Project Deepwater Port Application by the Liberty Natural Gas LLC (LNGLLC) for the formation and operation of a terminal for the transport of Liquid Natural Gas (LNG).

#### WHO IS LIBERTY NG LLC?

Liberty Natural Gas, LLC, the developer of the Port Ambrose project, is a portfolio company of a fund advised by West Face Capital, a Toronto, Canada based investment management firm. In addition to the Port Ambrose project, West Face Capital and its affiliates are currently developing a deepwater port project in northwest England (United Kingdom), known as Port Meridian, and are actively exploring opportunities for other international regasification/import projects. Both Port Ambrose and Port Meridian are being developed in coordination with Høegh LNG (Norway), which has extensive design and operations experience in both LNG terminals and LNG delivery vessels. When operational, Port Ambrose and Port Meridian can be used as an integrated LNG system to deliver cargos on a seasonal basis to both the New York and UK markets. More information about the Port Meridian project can be found at <http://portmeridian.com/>.

This is a foreign entity seeking enrichment by exploitation of the market forces of the US. Whether as an export or import port, this foreign corporation places the American

public, the eastern coast of the United States, its economy, its marine-based recreational activities, commercial and recreational fishing and adjoining industries, the marine resources, the fisheries, the property, the water quality and quality of life of residents of the east coast at risk. The risk does not benefit the American public, as only 5 permanent jobs will be made. This project is hardly worth the risk.

## PROJECT DESCRIPTION

The DEIS tells us:

"Port Ambrose is a deepwater port consisting of a submerged buoy system for natural gas deliveries that will be located in federal waters approximately 19 miles from the New York shore. Liquefied Natural Gas (LNG) supplies will arrive at Port Ambrose via specially designed Shuttle & Regasification Vessels (SRVs). Once the SRV is connected to the submerged buoy system, the LNG will be regasified on board and natural gas will be transferred into a new twenty-two mile subsea pipeline that will connect offshore into the existing Transco Lower New York Bay Lateral pipeline serving Long Island and New York City." (<http://portambrose.com/project-description/>)

Two buoys would be tethered to the ocean floor and connect ships to a proposed undersea pipeline that would deliver into existing gas infrastructure on Long Island. <http://saneenergyproject.org/port-ambrose-liquefied-natural-gas-off-long-islands-shores/>

Massive public opposition has already been recorded against this project. The commercial and recreational and commercial fishing industries, whale watching industry, environmental groups, scientists, dozens of organizations and businesses as well as the general population have spoken against this project. This is not surprising. the project is a very bad idea. NY4Whales has major concerns about the unreliable and unlikely promise of "safety" in construction and operation of an LNG port which is a high risk activity threatening this extensive and critical shoreline economy and environment, as well as the health and well-being of its population and wildlife.

Commonplace predictable pipeline accidents, seepage and leaking from infrastructure, even ballast water exchanges during shipping among other problems make this project completely unacceptable. This dangerous facility is in close proximity of New York City, the world's most densely populated metropolitan area. An inevitable mishap would present devastating consequences to the entire region as well as the surrounding environment.

Impact assessments from the DEIS:

Proposed Action: Water quality impacts during construction would consist primarily of short-term increases in turbidity associated with bottom sediment disturbances during proposed Mainline lowering/backfilling and during the installation of the STL Buoy systems. Other short-term minor water quality impacts would be anticipated in association with routine discharges from the

construction vessels and the discharge of proposed Mainline hydrostatic test water at the PLEM locations in federal waters. Operation of the proposed Port facilities would be expected to result in short-term minor adverse water quality impacts resulting from sediment disturbance and turbidity caused by riser pipe movement and STL Buoy anchor chain movement, as well as accidental releases of petroleum products, LNG, and/or other chemicals.... Vessels used during decommissioning would have routine vessel discharges and the potential for accidental releases, but since the proposed Mainline would be abandoned in-place, the extent of the impacts would be over a much smaller area than that associated with the original construction. (DEIS. ES21)

#### ESSENTIAL FISH HABITAT (EFH)

The DEIS would have the public believe that the construction and operation of the project would have no significant impact on essential fish habitat.

Construction, operation, and decommissioning of the proposed Project would have no significant impact on a number of designated EFH species. However, direct, short-term impacts from these activities are expected via displacement from the water column to designated EFH species. In addition, direct and short- to long-term impacts from construction, operation, and decommissioning have the potential to exist from the displacement of benthic habitat. Construction, operation, and decommissioning of the proposed Project would have no significant impact on EFH within the ROI. Impact that does occur would be highly localized direct impacts within the footprint of the proposed Project ranging from short- to long-term on the habitat and associated prey species for the duration of activities. However, since the ROI represents only a very small portion of this type of available offshore benthic and water column EFH in the New York Bight, only a commensurately small portion of available EFH would be potentially exposed to adverse impacts. (DEIS, ES-19)

NY4Whales questions this reasoning. If displacement and pollution from the project causes EFH to degrade and fish to disappear, this is a major impact. The detriment affects the entire ecosystem, from benthic species that feed the overall and nectonic food web, as well as the fishing industry that relies on safe clean water and the marine life it provides for human consumption. Pollution is pervasive, wide-reaching and long-lasting. Critical benthic habitat will be destroyed; tethers attached to buoys will continue to shift making recovery impossible. As stated earlier, persistent pollutants previously dumped in the bight will be churned up and accessible to the water column, further exacerbating the loss of EFH, a detriment to all species in the area.

From the 1800's, the NY Bight has been a dumping ground, receiving raw sewage, garbage, contaminated dredgings, sewage sludge, acid waste, incinerated toxic waste

The waters of the NY Bight have been used as a dumping ground since at least the 1800s. Until the early 1900s, disposal of raw sewage, garbage, refuse, and street sweepings occurred in the inner NY Harbor. As the local population soared, raw sewage and dead animals putrefied rivers, public health suffered, and odors and debris became gruesome and fearsome. As a solution, disposal

activities were moved to the outer Harbor and then, eventually, to the ocean waters of the Bight.

In 1984, with eight ocean dumpsites, the Bight was the "Ocean Dumping Capital of the World." The eight dumpsites included those for contaminated dredged spoils, sewage sludge (two sites), acid waste, wood incineration, construction rubble, incinerated toxic wastes, and industrial wastes. (<https://cleanocean.wordpress.com/bight/>)

and

#### Existing Dump Sites in the New York Bight

There are currently five dump sites in the New York Bight... These sites are all located within the Bight Apex (Figure 2). They include the sewage sludge site, the dredged material (mud) site, the cellar dirt (rubble and debris) site, the acids wastes site, and the wreck (derelict vessel) site (Table 1). A sixth dump site, the chemical wastes site, is located approximately 196 km (106 n mi) from the harbor entrance, on the edge of the continental shelf. This dump site is just outside the New York Bight (Figure 1 and Table 1). Roughly 70 percent of the municipal wastes and 60 percent of the industrial wastes that are ocean dumped in the United States are dumped at these six sites (USEPA, July 1974). Environmental Impact Statement on the Ocean Dumping of Sewage Sludge in the New York Bight Draft February 1976.

Lethal toxins having settled on the seafloor will be disturbed by construction and operation of the port.

The New York Bight sediment has been a subject of research for almost a century.... Some pollutants derive from past dumping, which is documented in the sediment by persistent compounds such as polycyclic aromatic hydrocarbons (PAHs) and dicarboxylic acids. Sites located closer to the Dredged Material Dump Site are richer in hydrocarbons, whereas sites located closer to the Sewage Sludge Dump Site are richer in plasticizers (dicarboxylic acids).... Styrene (straight-chain hydrocarbon) and plasticizers present in the sediment samples originate from sewage sludge. High amounts of PAHs (polycyclic aromatic hydrocarbons) originate from both ash and petroleum.... The highest concentrations of organic matter and fine-grained sediment were found in cores located close to Sandy Hook and in Hudson Shelf Valley. The sediment samples are predominantly sandy with only a minor amount of silt, clay and gravel. The solid particles of the waste such as ash, synthetic fibers, pieces of bricks, porcelain, plastic, and glass introduced into the sediment changed its natural texture. Most of the sediment samples represent a reducing to strongly reducing environment causing the depletion of oxygen and of aquatic life as well as the increase in time of pollutants decomposition. The presence of hydrogen sulfide makes the environment toxic for most of the biota. Some of the detected hydrocarbons are polycyclic aromatic hydrocarbons (PAHs) which have been shown to be carcinogens and/or mutagens. (Moch Aleksandra; Friedman Gerald M., 1999: The impact of organic-rich waste released into New York Bight sediment. *Northeastern Geology and Environmental Sciences* 21(1-2): 49-101)

Construction at this site will resuspend these persistent pollutants, causing them to migrate throughout the region creating a hazard to biological life. This should not be considered a minor impact, as the hazards presented by sediment materials is well-known. Because of the location and geography of the bight, and the increase risk of ocean surges, it is certain that the chemicals churned up from sediments will be carried, along with the the 3.5 million gallons of chemically treated saltwater throughout the bight and beyond to wreak havoc along the way.

#### GEOGRAPHICAL HIGH RISK FOR OCEAN WATER STORM SURGES

Hurricanes or tropical storms that hit the Northeast are pushed by prevailing winds in a northeasterly direction. While the frequency of strong non-tropical storms in all seasons are increasing, their origins and course are unpredictable. Storms and concomitant storm surges are driven by winds that may originate from the north, or south, easterly or westerly. This movement of waters, along with natural tidal and wave action will cause the polluted waters laden with the toxins released from sediments disturbed by the Port Ambrose construction into other regions. As was demonstrated by Hurricane Sandy, strong storm surges may drive ocean waters far inland. When pollution-laden waters comprise a storm surge, hazardous sediment particles are likely deposited onshore, far inland, into residential areas, creating a serious public health hazard. Fortunately, it will be possible to identify the “fingerprint” (via molecular “DNA” or specific chemical composition) of these toxins from their origins at the Port Ambrose construction site to anywhere along the east coast, such as up into waterways and estuaries such the Hudson and even Connecticut Rivers, as well as points south. LNG LLC as well as cooperating agencies will be responsible for the pollution that raises levels of identified toxins that emanate from the Port Ambrose construction site for failing to protect both local and far-reaching ecosystems and overall public health.

Hurricane Sandy brought impacts that were actually worse than the 500-year surge event calculated by the 2012 study, since the combination of the storm surge and astronomical high tides caused the peak storm tide during Hurricane Sandy at The Battery in Lower Manhattan to reach about 4.23 meters above mean sea level. That was about 1 meter higher than the 500-year storm tide calculated for the 2012 study.

By hitting the coast at a nearly perpendicular angle, Sandy brought its strongest winds and maximum storm surge to the New Jersey and New York coastlines. The [storm surge](#) was aided by the timing of high tide and the geographical features of the coastline, which tends to maximize the potential surge in certain areas depending on the wind direction, including New York Harbor.

Typically, the tropical storms and hurricanes that strike the Northeast are pushed in a northeasterly direction by the prevailing upper level winds. That was the case, for example, with Hurricanes Gloria in 1985 and Bob in 1991. Those storms hit the coast at a grazing angle, and only areas of land that stick out into the ocean, such as Cape Hatteras, N.C., and Cape Cod, Mass., have a long history of experiencing storms that hit at a more perilous perpendicular angle. [ibid climatecentral](#).

## INEVITABLE DEAD ZONE

Resuspension of toxic sediments, admitted “routine discharges” and “accidental releases of petroleum products, LNG, and/or other chemicals” are unacceptable. It is well known that roughly half of the oil pollution in our oceans originates from “minor” accidents, infrastructure (pipeline, valve, fittings, joint) failings as well as the ballast water exchanges that are “routine”, even if illegal. If one gallon of oil contaminates one million gallons of water ([http://www.nccwep.org/help/did\\_you\\_know.php](http://www.nccwep.org/help/did_you_know.php)), and “one quart of motor oil can create an oil slick two acres in size” (*ibid*), our shoreline, the local fisheries, the marine life, from the plankton to the whales will writhe through an increasingly sickly soup that will certainly result in a new and very large dead zone - right at the place that has been the livelihood, economic life and beach playground, of tens of millions of people living on the east coast. With the inevitable and anticipated massive dead zone caused by the “minor, accidental and routine discharges of petroleum products” this one facility will cause economic failure effecting the beaches of New Jersey and New York, including Atlantic City, Asbury Park, Wildwood, Cape May, the south shore of Long Island and the Hudson River coastline.

The amount of pollution generated by this project is so great it defies calculation. 3.5 million gallons of chemically treated saltwater will be discharged into the Atlantic Ocean just for the purpose of testing the integrity of the pipeline! This pollution should not be tolerated by the USCG, MARAD, or any of the cooperating agencies.

## “MINOR” SPILLAGE UNREPORTED, UNACCEPTABLE

In fact, most of the fossil fuel pollution of our oceans and waterways remains unreported simply because it is not a “major” headline-grabbing oil spill. No, this incremental but nefarious and destructive pollution originates from the very nature of the applicant’s activity. In short, the Applicant is requesting approval to release petroleum products in the presence of the NJ/NY shoreline. However, the marine environment can not tolerate any petroleum product pollution. The economies that are supported by this region’s rich marine ecosystem, the area around Port Ambrose north, south and east, will suffer and eventually be unable to support the existing economy, especially with the increase of the latent pollutants and a growing dead zone over time. This is absolutely intolerable.

## UNQUANTIFIED RELEASES NOT ACCEPTABLE

Furthermore, “routine discharges” and “accidental releases” are unquantified in the DEIS. How much petroleum product and LNG is acceptable for release? One teaspoon? Or one hundred million gallons? The DEIS provides no limitations on the amount of contaminants being released, which it identifies as “minor” and “insignificant”. Routine seepage and leakage in infrastructure are all too common on projects that cause local and far reaching environmental devastation. Lack of quantification allows undefined amounts of released materials, however large they may be. If they are routine and expected, they should not be allowed. The release of ANY of these contaminants is unacceptable. It is unfair and unreasonable to inflict the fisheries, the aquatic life, the ecosystems and the well-being of the residents of NY and NJ with this kind of assault.



“The Region of Influence (ROI) for impacts on water resources includes the area within and directly adjacent to the proposed Port location and Mainline route that could be affected by the proposed Project. Construction, operation, and decommissioning of the proposed Project is expected to have no significant impact on the physical oceanography of the New York Bight. Any impact that does occur would be minor and localized.” (DEIS ES-15)

#### ESSENTIAL FISH HABITAT (EFH)

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NY4Whales questions this reasoning. If displacement and pollution from the project causes EFH to degrade and fish to disappear, this is a major impact. The detriment affects the entire ecosystem, from benthic species that feed the overall nectonic food web, as well as the fishing industry that relies on safe clean water and the marine life it provides for human consumption. Pollution is pervasive, wide-reaching and long-lasting. Critical benthic habitat will be destroyed; tethers attached to buoys will continue to shift making recovery impossible. As stated earlier, persistent pollutants previously dumped in the bight will be churned up and accessible to the water column, further exacerbating the loss of EFH, a detriment to all species in the area.

New York State has warned of the inability of fisheries to withstand storm surges and their concomitant pollution they bring:

NYS has designated Bird Conservation Areas along the NY Bight, including Clay Pit Ponds, Long Island’s South Shore Tidal Wetlands, the Sarnoff Pine Barrens Preserve, Napeague at Montauk. <http://www.dec.ny.gov/animals/32121.html>. These would not be safe from incoming contaminated surges. Shellfish Harvest Areas along the south shore of Long Island also will be affected. Long Island is ideally situated so that both southern and northern fish species frequent our waters. You can fish for Atlantic cod, winter flounder and mackerel in the spring, or try your luck for bluefish, summer flounder and Spanish mackerel when school is out. <http://www.dec.ny.gov/outdoor/7755.html>

commercial lobster, crab and whelk fisheries and commercial squid fishery, <http://www.dec.ny.gov/outdoor/26821.html>

The NYS DEC stresses the need for conservation among a large number of species that use the area and waters around the Port Ambrose site for habitat:

NYS Species of Greatest Conservation Need (SGCN) list includes a number of marine species, birds, mammals and aquatic species for which conservation action is urgent as they are in decline. This partial list of species find habitat along the NJ/NY coastline of the NY Bight and the waters directly connected to Ambrose:

Pipine plover, sei, sperm whales, buff-breasted sandpiper, cape May warbler, roseate tern, saltmarsh sparrow, seaside sparrow, semipalmated sandpiper, upland sandpiper, blue whale, fin, harbor porpoise, NA Rt. whale, atlantic coast leopard frog, green, kemp's ridley, leatherback, loggerhead, American eel, bigeye chub, Atlantic sturgeon, American shad, disk shark, lined seahorse, northern pipefish, porbeagle shark, rougtail stingray, sand tiger shark, winter flounder, American lobster, horseshoe crab, bay scallop, dwarf wedgemussel, hard clam, oyster, yellow lampmussel, Atlantic salmon.

[http://www.dec.ny.gov/docs/wildlife\\_pdf/sgcnlist.pdf](http://www.dec.ny.gov/docs/wildlife_pdf/sgcnlist.pdf)

#### DNA IDENTIFICATION OF TOXINS FROM PORT AMBROSE

Hurricanes or tropical storms that hit the Northeast are pushed by prevailing winds in a northeasterly direction. While the frequency of strong non-tropical storms in all seasons are increasing, their origins and course are unpredictable. Storms and concomitant storm surges are driven by winds that may originate from the north, or south, easterly or westerly. This movement of waters, along with natural tidal and wave action will cause the polluted waters laden with the toxins released from sediments disturbed by the Port Ambrose construction into other regions. As was demonstrated by Hurricane Sandy, strong storm surges may drive ocean waters far inland. When pollution-laden waters comprise a storm surge, hazardous sediment particles are likely deposited onshore, far inland, into residential areas, creating a serious public health hazard. Fortunately, it will be possible to identify the "fingerprint" (via molecular "DNA" or specific chemical composition) of these toxins from their origins at the Port Ambrose construction site to anywhere along the east coast, such as up into waterways and estuaries such the Hudson and even Connecticut Rivers, as well as points south. LNG LLC as well as cooperating agencies will be responsible for the pollution that raises levels of identified toxins that emanate from the Port Ambrose construction site for failing to protect both local and far-reaching ecosystems and overall public health.

#### GEOGRAPHICAL HIGH RISK FOR OCEAN WATER SURGES AND FLOODING

The New York Bight describes an area of the Atlantic coast that ranges from Cape May inlet in New Jersey to Montauk Point at the eastern end of Long Island. The area and its geographic features are considered high risk for ocean-water surges and flooding:



The geography of the bight is such that the coast makes a nearly right angle bend at the mouth of the Hudson. This feature has long been of major concern to meteorologists in the study of tropical storm patterns along the east coast, and is one of the primary reasons why the New York Metropolitan Area is considered a high danger zone for storm generated ocean-water surges, despite its northerly latitude. (Larson, Erik. "Hurricanes on the Hudson". *The New York Times*. September 25, 1999) Specifically, in the presence of a hurricane off the coast of New Jersey, the easterly cyclonic winds along the northern edge of the storm could drive a strong surge to the west, laterally along the southern coast of Long Island and straight into Lower New York Bay. The angle bend of the New Jersey coast would leave little outlet for the surge, leading to widespread flooding throughout New York City, especially along the southern coast of Staten Island and Manhattan; storm surges of up to 30 feet (9.1 m) were reported in the hurricane of 1893. [Naparstek, Aaron. "THE BIG ONE: Experts say it's only a matter of time before a major hurricane". *New York Press*. July 27, 2005; and Richard Davis, Duncan FitzGerald: *Beaches and coasts*, p.96 Wiley-Blackwell; (2004) ISBN 0-632-04308-3] and [Michael J. Kennish: *Pollution impacts on marine biotic communities*, p. 103; CRC Press; (1997) ISBN 0-8493-8428-1] in [http://en.wikipedia.org/wiki/New\\_York\\_Bight](http://en.wikipedia.org/wiki/New_York_Bight)).

There is no guarantee that “minor” and “routine” accidental seepage of petroleum products and ballast exchange from transport vessels will not permeate the NJ/NY Bight. While the “geography” of the NY Bight may not be impacted by terminal, its climate instability has increased high-intensity storms throughout the northeastern US.

The track of [Hurricane Sandy](#) was unprecedented in the historical record of North Atlantic Ocean Basin hurricanes, and its deadly storm surge — while exceedingly rare — is likely to become a more frequent event as the climate continues to warm due in large part to manmade greenhouse gas emissions. Those are the conclusions of a forthcoming study from researchers at NASA and Columbia University's Lamont-Doherty Observatory. (<http://www.climatecentral.org/news/hurricane-sandy-unprecedented-in-historical-record-study-says-15505>)

#### NEED IN QUESTION

NY4Whales questions the need for this project at all. The project is to chiefly facilitate the import of liquified natural gas (LNG) into the US. LNGLLC and the DEIS claims that the demand for LNG is growing. However, in reality, the demand for LNG has dropped so significantly that out of 18 projects that were approved, to this date only 3 are actually operating. Shortly after construction, it is expected that the terminal will be used to chiefly facilitate the export of LNG, which will lead to addition undesirable fracking across the US. Profits for LNGLLC will rise since foreign markets for LNG fetch higher prices. The American people at risk by the project will not benefit from this project.

In fact, subshale fracking has increased gas availability in the US, negating a need to import gas. Many believe Port Ambrose could easily be converted to an export terminal, increasing fracking throughout the US and its undesirable environmental consequences,

including destroying drinking water supplies. Such a conversion could take place without public input, as a simple application amendment, and the public would have no recourse for opposition. <http://www.longislandpress.com/2013/07/31/long-islands-offshore-lng-port-proposals-critics/>

“Five years ago companies were building terminals to import natural gas at the cost of billions of dollars because analysts believed that the U.S. was gonna need natural gas from overseas,” said Rep. Ted Poe (R-Texas) in an April hearing on exporting LNG. “Today that scenario has changed 180 degrees.” <http://www.longislandpress.com/2013/07/31/long-islands-offshore-lng-port-proposals-critics/>

Critics note that exports of LNG from the US will cause a drop in availability, and an increase in price to consumers here in the US. Who would profit? LNGLLC.



FRACKING MAD: Craig Stevens, who drove from Pennsylvania to Long Beach for the July 9 hearing on a proposed LNG port off the coast of Long Island, argues that the plan is a ruse to export natural gas from a drilling boom that he blames for poisoning drinking water with toxic chemicals.

ibid.

Many are convinced that the project is being set up for imports and a quick turnaround for exports, to increase profit.

[One representative] of the Connecticut Energy Marketers Association, isn't buying it, saying he "would not put it past them to do a bait-and-switch." "Natural gas companies are in business to make money," he says. "I would not be surprised if the real purpose of the construction was not to stabilize prices, but to maximize profits."

Kevin Rooney of the Long Island Home Heating Oil Association... notes that if the Department of Energy approves LNG exports to non-free trade agreement nations, more demand will cause a domestic natural gas prices spike.

“Once we become the biggest gas exporter in the world, you’re going to see the same thing happen in their market that’s happened in ours,” he says, referring to oil prices subject to the mercy of Wall Street and foreign powers. “They are setting themselves up for a rapid escalation in prices.” *ibid.*

Opposition to the project has been unrelenting, vocal and constant, even coming from elected officials:

Capt. Jim Lovgren, a commercial fisherman on the board of directors for the Point Pleasant Beach Fishermen’s Dock Cooperative, said the proposed site would interfere with fishermen.

“It’s in the fluke, squid and monkfish grounds for us trawlers. It’s a prime breeding ground for squid that lay a lot of eggs there,” Lovgren said.

The Deepwater Act prohibits the U.S. Maritime Administration from issuing a license without the approval of the governor of each adjacent state. In 2011, the same company tried to build an LNG port 16 miles off the coast from Asbury Park but Gov. Chris Christie vetoed the project. He said it would present unacceptable and substantial risks to the state.

"I have been opposed to this for several years now. I don't know what it's going to take to have LNG understand that we don't want the Port Ambrose project. For those of us who live at the Jersey Shore why would we want the industrialization of the ocean that holds so many environmental risks, that threatens our beaches and fisheries?" said Sen. Jennifer Beck, R-Monmouth.

<http://www.app.com/story/news/local/2015/01/08/liberty-natural-gas-deepwater-port-faces-tough-opposition/21477635/> (Asbury Park Press)

NJ’s beaches are vital to the recreation and tourism industry of the Jersey shore. Since [Hurricane] Sandy our focus has be to promote recovery efforts to the region not needlessly invite additional problems that would delay or impede the recovery of our long suffering area. This port would discharge 3.5 million gallons of chemically treated saltwater and require 20 miles of seaport dredging to accommodate this pipeline. This pipeline brings no benefits to the state of NJ!” Caroline Cassagranda, Assemblywoman 11th district. *ibid.*

## IS THIS ABOUT INCREASING FRACKING?

Opponents ask why we need an LNG import terminal in the first place, citing a falling demand for LNG, and more than adequate supply here in the US from fracked gas.

Prevailing suspicions are that after construction the port will be converted (with an amended application) into an export terminal. As an export facility, Port Ambrose will send LNG to foreign markets for higher prices. The source: American fracked gas! If

LNG is exporting fracked gas there will be a rise in demand, i.e., increased domestic fracking! Although there is plenty of resistance to an LNG import terminal, there would be even more against an export facility dependent on more fracking in the US! Building Port Ambrose as an import facility with a quick paper conversion to export, will cause a rise in demand for fracked gas, as domestic gas is liquified and sent overseas. This in turn will cause domestic gas prices to rise. No doubt about it, this LNG port represents a big win for Big Oil and Big Gas.

What will happen to the 26 cetaceans species, the fisheries, the marine life abundant in these waters? How will they cope with the admitted “routine discharges” and “accidental releases of petroleum products, LNG, and/or other chemicals”? These threats are unacceptable. “Minor” operation accidents, infrastructure (pipeline, valve, fittings, joint) failings as well as the ballast water exchanges that are “routine” are unacceptable.

The amount of pollution generated by this project is so great it defies calculation. 3.5 million gallons of chemically treated saltwater will be discharged into the Atlantic Ocean just for the purpose of testing the integrity of the pipeline! As toxic sediments resuspend, and as ocean water becomes increasingly polluted, dead zone(s) that grow in size are generated. This pollution should not be tolerated by the USCG, MARAD, or any of the cooperating agencies as it will lead to ruin. What about the marine mammals, seabirds, wildlife along the shores and the all-important fisheries? While the DEIS tells us effects will be short term and minimal, scientists, the environmental community and the public isn't buying it.

Please do not approve this project.

Sincerely,

Taffy Williams, President  
NY4Whales