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

2006 April 30

Re: Docket No. PF06-11-000 — Quoddy Bay LLC project

Dear Ms. Salas,

Save Passamaquoddy Bay is a 3-nation (U.S., Passamaquoddy, and Canadian) alliance of individuals and organizations surrounding Passamaquoddy Bay. Members include fishermen, tribal officials, tribal members, landowners, residents, business owners, marine scientists, educators, medical professionals, government officials, and others who have economic, cultural, familial, and social ties to the Passamaquoddy Bay area.

Members are concerned that LNG development in the unique environs of Passamaquoddy Bay will have severe and irreversible negative economic, cultural, safety, and environmental impacts. The proposed LNG projects have already had significant negative social impacts among family, friends, and neighbors — impacts that are likely to take decades to heal, whatever the outcome of the proposed local LNG projects.

NOAA Overlooks LNG Vessel Ballast
On 2006 April 27, NOAA National Marine Fisheries Service filed to this docket. In their comments, under the heading, “Analysis of impacts resulting from seawater intakes,” they indicated a concern that intaking seawater for LNG vessel engine cooling “has the potential to entrain and impinge living marine resources during operation.” They suggest that the anticipated volumes of seawater to be used by such engine cooling, and the foreseeable impacts on marine life be identified and quantified.

Save Passamaquoddy Bay is concerned that other seawater and/or freshwater intake potential impacts have been overlooked, and need to be addressed by NOAA National Marine Fisheries Service, as well as Maine fisheries and state and federal environmental regulatory bodies.

The other potential water intake would be required for LNG vessel ballast. While Quoddy Bay LLC has stated publicly that they will use only fresh water for ships’ ballast, it is entirely possible that at some future date they may use seawater. (See quotes from the Crown Landing EIS, below.) Alternatively, if only fresh water is used, then there is a concern that the volumes of water required for ships’ ballast would deplete the local aquifer.

Referring to the Crown Landing LNG project EIS, FERC Docket Number CP04-

411, Accession Number 20060428-4004 [see file *"crown-landing-eis-7.pdf"*, page 2-11, for portions of that filing relevant to the following quotes], the volumes of water required for LNG ships' ballast are quantified. Here is a quotation from that EIS:

> *A 138,000 m^3 LNG ship would typically take on ballast water at a rate of about 5,200 cubic meters per hour (m^3/hr) (about 1.4 million gallons/hour) and a 200,000 m^3 ship would take on ballast water at a rate of about 7,500 m^3/hr (about 2 million gallons/hour). For both ships, the ballast water would be taken on over a 10-hour period, resulting in a total ballast water intake per ship of about 52,000 m^3 (13.7 million gallons) for a 138,000 m^3 ship and 75,000 m^3 (19.8 million gallons) for a 200,000 m^3 ship.*

So, **each ship** would take on:
13.7 MILLION GALLONS to **19.8 MILLION GALLONS** of ballast water.

The EIS further goes on to state:

> *A portion of this ballast water would be taken on while at berth and **the remaining amount would be taken on while in transit down the Delaware River.***

Assuming that ballast water intake procedures are similar for all LNG tanker departures, then some ballast water is taken on at the pier, while other ballast water is taken on in early transit after departing from the pier. If that assumption is correct, then we must also assume that at least some ballast water for Quoddy Bay LLC's proposed project will be seawater.

Three Significant Concerns About Water
We have two concerns regarding the sources of the LNG tankers' ballast water, plus a third concern regarding additional water usage.

1. Seawater as Ballast
If seawater makes up the total ballast, or just a portion of the total ballast, then there will be entrainment, impingement, and loss of larvae, eggs, and other marine resources. Since Passamaquoddy Bay is a major nursery to the Bay of Fundy and the Gulf of Maine, we are concerned that seawater ballast will have a significant negative impact, especially on Maine and New Brunswick lobster fisheries, as well as on other fisheries and feedstocks for other species.

We insist that FERC, federal environmental, and state environmental agencies fully investigate and report on the effects of LNG vessels intaking **BILLIONS OF GALLONS** of seawater out of the project's proposed location in Passamaquoddy Bay per year. And, since there are three developers proposing LNG terminals here, we insist that the study account for the cumulative environmental impact from multiple projects.

2. Fresh Water as Ballast
Since Quoddy Bay LLC has publicly indicated that they will be using fresh water for LNG vessel ballast — despite the contraindication in the Crown Landing EIS — then, considering the nearly 14–20 million gallons of fresh water per ship,

times Quoddy Bay LLC's projected 180 LNG ships per year, there will be a total of from **2.466 BILLION GALLONS** to **3.564 BILLION GALLONS** taken **from the local freshwater aquifer per year** for ballast water alone. The above freshwater would be taken from the local aquifer at a rapid rate of **1.4 – 2.0 million gallons/hour,** with all the attendant affects of doing so.

We insist that FERC, federal environmental, and state environmental agencies fully investigate and report on the full effects of LNG vessels intaking these billions of gallons of freshwater from the local aquifer per year, and at the rapid rate indicated. This would include the effects on the freshwater supply for Perry, Sipayik, Eastport, and other communities that are connected to the same aquifer. It also would include the effects on lakes, ponds, and freshets and their distributaries. In turn, that would include the effects on freshwater animal and plant species in those lakes, ponds, freshets, and distributaries. Since there are three developers proposing LNG terminals along the Maine side of Passamaquoddy Bay/St. Croix River, we insist that the study account for the cumulative environmental impact from multiple projects.

Further, since Passamaquoddy Bay and surrounds lie atop several active seismic faults, we insist that the implications of removing such large volumes of water, and its associated weight, from the local aquifer be applied to the area's active seismic characteristics, and they be fully studied and reported to the public. Since there are three developers proposing LNG terminals in the area, we also insist that the study account for the cumulative seismic impact from multiple projects.

3. Additional Water Usage

None of the above volumes of water include the amount of water — either seawater or freshwater — that would be required to regasify the project's annual volume of LNG. We insist that FERC, federal environmental, and state environmental agencies also account for the cumulative environmental impacts from also taking the additional volumes of water — both as fresh water and as seawater — that would be used in Quoddy Bay LLC's regasification process. Again, since there are three developers proposing LNG facilities here, we insist that the study account for the cumulative impact from multiple projects.

Save Passamaquoddy Bay and I appreciate the opportunity to make these comments to the FERC docket, and trust that FERC will take the required action regarding our concerns.

Very truly,

Robert Godfrey

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