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September 20, 2004

Magalie R. Salas, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E., Room 1A
Washington, DC 20426

RE: Weaver's Cove Energy, LLC
Mill River Pipeline, LLC
Docket Nos. CP04-36-000 and CP04-41-000 and FERC/EIA-0169D

Dear Ms. Salas:

I am writing to bring to the Commission's attention several deficiencies in the Draft Environmental Impact Statement (EIS) recently issued in these dockets and to request that these be rectified through publication of a Supplemental Draft EIS with adequate time for public comment before publication of a Final EIS. The deficiencies include inadequate analysis of the impacts of siting a terminal in such close proximity to a major population center, the impacts of harbor dredging on water quality and fisheries habitat, the disposal of contaminated dredge material on a site currently undergoing remediation, and the potential for lesser environmental and public safety impacts from other proposed liquefied natural gas (LNG) import terminals in and near the region.

Given our experience with LNG shipments and storage in a post-9/11 world, ensuring homeland security and the protection of public safety is of primary importance to my administration and to the citizens of Massachusetts. Fall River and the communities adjacent to the Taunton River are densely populated areas. There are homes in Fall River located in close proximity to the site, just 1,200 feet away, and it is estimated that approximately 9,000 residents live within one mile of the site. During the public hearing for this project, questions arose regarding the adequacy of exclusion zones and the accuracy of vapor dispersion modeling. These issues must be thoroughly examined and analyzed to ensure public safety.

There is simply no way that is makes sense to site an LNG facility in this location in the post 9-11 world. A thorough review would confirm this conclusion.

The Draft EIS does not provide sufficient information to fully evaluate the potential risk to public safety from LNG shipments and the adequacy of measures proposed to protect communities along the channel. As proposed, LNG shipments would be required to navigate nearly 25 miles of the channel and pass under four bridges before reaching the LNG terminal. The Draft EIS does not provide adequate information concerning the impacts to traffic and public safety due to potential bridge closures. Moreover, in a report that is well over 400 pages in length, the section dealing with "Terrorism and Security Issues" is approximately 2 pages in length and is unsatisfactory in its treatment of security concerns. For example, the report does not address the current intelligence regarding threats to LNG facilities or the mechanisms that would be in put into place to identify potential threats. Furthermore, the Draft EIS is lacking critically important information regarding the need for public safety personnel during shipments and emergency responses, and whether the local communities will have the personnel, training and equipment necessary to provide such services.

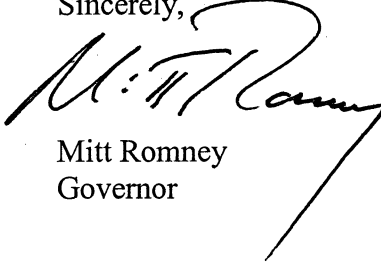
The proposed project also has significant environmental impacts that have not been adequately addressed. In order for LNG ships to navigate the Taunton River, the project requires the maintenance and improvement dredging of more than 2.5 million cubic yards of sediment from the river. The dredging portion of the project would occur on a continuous basis, 24-hour a day, 365 days per year, for three years. This large-scale dredging project, coupled with its extremely aggressive construction schedule, would have significant impacts on the environment. The project would adversely affect the aquatic environment, degrading water quality and fisheries resources. This dredging project, without appropriate phasing and time of year restrictions, could significantly impair the Taunton River ecosystem. Furthermore, the Draft fails to provide adequate information on the proposed reuse of the dredged sediment on the 73-acre LNG terminal and tank site. Currently, there is an active remediation of contaminated plumes within the site. The Draft does not contain sufficient information to thoroughly evaluate the need for locating such a large volume of material on this site or the impacts that such an action could have on the cleanup of existing contamination.

In addition, the Draft EIS' analysis of alternatives to the siting of an LNG import terminal at Weaver's Cove is inadequate and should be expanded in a Supplemental Draft. Apart from the Keyspan proposal in Providence Harbor, the Draft EIS does not give in-depth consideration to other potential LNG import terminals. Since Weaver's Cove filed its application several other proposals have been made to site LNG import terminals in New England and nearby regions, including the Quoddy Bay project proposed for Pleasant Point, Maine, the Irving Oil project proposed for St. John, New Brunswick and the Excelebrate's Energybridge project off-shore of Cape Ann, Massachusetts. One or more of these terminals, if permitted, might serve the future natural gas needs of the New England market with less environmental and public safety impacts than the Weaver's Cove terminal. A Supplemental Draft EIS should include a careful analysis of the environmental impacts and security concerns of all currently known LNG project proposals that might serve the region and a comparison of their impacts to the impacts of the Weaver's Cove project.

The Commission should know that this fall several of the New England states will join forces to undertake a comprehensive assessment of the future role of natural gas and LNG in New England. This assessment will analyze the expected future demand for and supply of natural gas in the region and the role LNG is likely to play in meeting the region's future energy needs. It will likely be completed before a Supplemental Draft EIS and certainly before a Final EIS. If so, we trust that the FERC's analysis of the need for additional LNG supplies in the region will give due consideration to the findings and recommendations contained in the Governors' assessment.

These are among the most serious deficiencies in the Draft EIS. Several agencies of the Commonwealth have been conducting independent reviews of the project in accord with their respective authorities under state law. I ask that you give careful consideration to the comments these agencies file in this proceeding. Again, I strongly urge you to issue a Supplemental Draft EIS for the Weaver's Cove project with more complete analysis of its potential impacts than can be found in the Draft EIS.

Sincerely,

A handwritten signature in black ink, appearing to read "Mitt Romney". The signature is stylized and cursive, with a long, sweeping tail that extends downwards and to the right.

Mitt Romney
Governor