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July 1, 2013

Ms. Yvette Fields
Director, Office of Deepwater Ports
Maritime Administration
1200 New Jersey Ave. SE
Washington, D.C. 20590

Mr. Mark Prescott
Chief, Deepwater Ports Standards Division
U.S. Coast Guard
2100 Second St., SW
Washington, D.C. 20593

Re: Docket Number USCG-2013-0363

Dear Ms. Fields and Mr. Prescott:

On Friday, June 14, the Maritime Administration published a notice of application for the above-referenced project, a proposed liquefied natural gas (LNG) deepwater port called “Port Ambrose” to be located in coastal waters in the vicinity of Long Beach, New York, and Sandy Hook, New Jersey. On June 24, the public was informed that the Maritime Administration intended to schedule only two public scoping hearings on the project, and that the public comment period would conclude just thirty days later, on July 23. This is the minimum number of hearings, and the minimum amount of time allowed by law, and we think it is inadequate given the scale of the project, and its potential impacts.

We understand that the project’s sponsor, Liberty LNG, is entitled to have its application handled in a timely way, but the public also has a right to fully consider the impacts of an LNG port that could pose a major security threat to a densely populated area, risks burdening the region’s ecosystems with air and water pollution, and will tend to discourage investment in renewable energy supplies. Also, while the project sponsors persist in describing Port Ambrose as an import terminal that will receive LNG from Trinidad and Tobago, a Deepwater Port Act license allows both imports and exports. For that reason, all the “upstream impacts” associated with the extraction and transmission of shale gas should also be considered in assessing the potential impacts of this project.

Notice of the two public hearings (on Tuesday, July 9, in Long Beach, N.Y., and on Wednesday, July 10 in Edison, N.J.) was published in the Federal Register on Monday, June 24, just fifteen days in advance of the first hearing, which is inadequate notice for such important events. Moreover, both hearings are scheduled for the week immediately following the Fourth of July weekend, which is typically one of the most popular vacation weeks of the year. This will make

it difficult or impossible for many interested parties to attend either of these hearings or to prepare for meaningful public participation. Each hearing is scheduled to last only two hours, barely enough time for forty people to speak for three minutes each. Given that an LNG port in coastal waters could negatively impact millions of Americans, a total of four hours of public comment is clearly inadequate.

Finally, the public is expected to provide detailed scoping comments on the proposed project in the absence of critical information. In a letter dated June 21, 2013, Mark Prescott, Chief, Deepwater Ports Standards Division of the U.S. Coast Guard, summarized over one hundred and fifty data gaps in Liberty LNG's application affecting such crucial concerns as air and water quality, noise pollution, biological and cultural resources, navigation issues, multiple use issues, safety and security issues, LNG export and public-need questions, and failures to adequately analyze alternatives. The Bureau of Ocean Energy Management has also raised questions about the impact the LNG port would have on a proposed offshore wind farm sited in the same location as the deepwater port, and the U.S. Fish and Wildlife Service has not yet commented on the application.

Under these circumstances, it is manifestly unreasonable to expect either the general public or concerned individuals with scientific and technical expertise to submit thoughtful and comprehensive scoping comments on an application of over fifteen hundred pages by July 24. Therefore we respectfully request that the Maritime Authority use its statutory authority to stop the Deepwater Port Act clock for an extended public comment period of at least one hundred and twenty days and schedule additional hearings in New Jersey and on Long Island. We also request that public hearings be held in the shale-bearing regions of New York State and Pennsylvania, because it is reasonable to assume that these regions will be impacted by this project.

Sincerely,

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cc: The Honorable Andrew M. Cuomo
The Honorable Chris Christie
Senator Charles E. Schumer
Senator Kirsten Gillibrand
Senator Robert Menendez
Senator Jeff Chiesa
Representative Robert E. Andrews
Representative Timothy H. Bishop
Representative Yvette D. Clarke
Representative Chris Collins
Representative Joseph Crowley
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