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May 27, 2004

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

Re: *Comment on Consequence Assessment Methods for Incidents  
Involving Releases from Liquefied Natural Gas Carriers*  
**Docket No. AD04-6-000**

Dear Ms. Salas:

Save Casco Bay, Inc., is a nonprofit corporation whose members are both mindful of the need for increasing supplies of clean fuel sources such as natural gas, and concerned about proposals to locate an LNG terminal in Casco Bay, Maine. We support a regional approach to the process of choosing an appropriate site for LNG terminal facilities.

Our membership comprises people from all walks of life whose unifying concerns are the health and safety of the people in the area of Casco Bay and the preservation of Casco Bay as a natural and economic resource. Our concerns are not hypothetical; Casco Bay is still recovering from an oil spill that occurred more than 30 years ago.

We write to thank the Commission for contracting for careful research and development of methodologies for modeling liquefied natural gas spills on water. The consequences of LNG spills and the impact on the local economy of the precautions needed to avoid them are the heart of our concern. We support a regional approach to the siting of LNG terminal facilities in order that these consequences and impacts can be compared and needed infrastructure can be sited in locations where it will have the least negative impact on other sectors of the economy such as the lobster fishing industry.

We recognize that the Commission's request for comments on the ABSG Consulting final report will attract criticisms of various aspects of the report's methodology and recommendations. In the evaluation of these criticisms and in the adoption of final assessment methods, the Commission will not always have definitive answers to issues of science and engineering. In such cases, the Commission will be urged to adopt methods that favor LNG terminal applicants even though more conservative methods and assumptions are scientifically supportable. In these cases, the resolution of the issues by the Commission and its staff becomes a matter of regulatory policy, not science or engineering.


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We urge the Commission and its staff to adopt the most demanding and conservative approaches and assumptions for its consequence assessment methodology. Whatever position one takes on the development of LNG terminals, public safety, protection of the environment, and preservation of existing jobs are the paramount concerns.

This country's experience with Three Mile Island, devastating coastal oil spills, terrorist attacks, and other threats to public health and safety has demonstrated repeatedly that design and operational standards frequently fall short when tested by real events. An event called an "incident involving a release" by LNG terminal operators is in reality a loss of life and livelihood for real people. If a tragic accident occurs, let no one be able to say that this Commission's consequence assessment methodology proved inadequate.

Very Truly Yours,

Save Casco Bay, Inc.

By:   
Beverly S. Johnson  
Its: President

cc: The Honorable Olympia Snowe  
The Honorable Susan Collins  
The Honorable Thomas Allen  
The Honorable Michael Michaud  
The Honorable John Elias Baldacci  
Jack Cashman, Commissioner -- Maine Dept. of Economic and Community Development  
Members of the Joint Standing Committees of the Maine State Legislature on Utilities and  
Energy, and Natural Resources