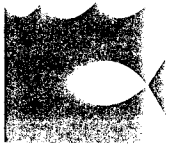


02-04-23



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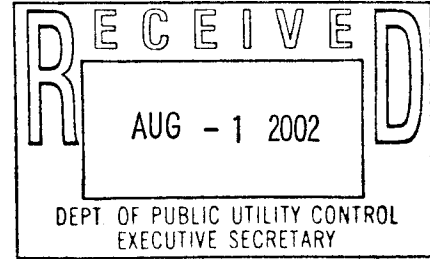
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received
7-26-02

July 19, 2002

Mr. Joel Rinebold
Executive Director
Institute for Sustainable Energy
Eastern Connecticut State University
83 Windham Street
Willimantic, CT 06226



Re: Preliminary Concerns Request

Dear Mr. Rinebold:

As per your request for preliminary positions, Save the Sound, Inc. submits this document as a member of the Long Island Sound Taskforce per Public Act 02-95. Save the Sound, Inc., (STS) is a regional non-profit membership organization dedicated to the restoration, protection and appreciation of Long Island Sound and its watershed through advocacy, education and research. Despite our deep concerns over the potential environmental effects of the transmission upgrade in upland portions of Connecticut, we will limit our comments to the Long Island Sound Crossings only. Additionally, while we understand that this request has been put to the Taskforce merely as a "preliminary position paper," STS nonetheless reserves the right to delete or add to any portion of these comments. We do not yet feel fully comfortable that 1) enough information has been gathered¹ nor 2) the information we have reviewed thus far has actually been processed to the extent necessary for us to provide a very meaningful comment. That caveat aside, after reviewing those comments submitted in DPUC Docket #02-04-23 and after hearing the data and opinions given in the various workshops you so kindly arranged, we have the following preliminary concerns thus far:

1) Protection of Long Island Sound

One of our primary concerns is that this process ought not proceed under the assumption that utility companies must use LIS as a conduit for energy. Public Act 02-95 is entitled "An Act Concerning the *Protection* of Long Island Sound." Protection is defined as "cover[ing] or shield[ing] from exposure, injury, or destruction." No one should lose sight of that. The Taskforce should proceed with this journey as one that thoroughly protects Long Island Sound even if that means no traversing through the Sound (which may or may not be the case). We must provide for the safekeeping of LIS first, then conform our meeting of energy needs to that protection plan- not visa versa.

2) Alternatives

¹ STS does realize we are only in the beginning phases of this project and that an enormous amount of information will be revealed as the process moves forward.



STS would hope that *all* alternatives to Long Island Sound crossings be explored. There are some technologies which may seem far afield now, but may come to fruition in a few years. We would hope that the Taskforce be forward looking in its approach to alternatives and not merely look to current feasibility.

3) Future Policy

The work to be accomplished on this Taskforce is wide in breadth, but it is still limited in scope. The legislation spells out precisely what types of inventory and evaluations are to take place (although the public hearings and workshops have opened that mandate further if we are to do a truly comprehensive study and plan). However, even under the best scenario, whereby the Taskforce provides extremely comprehensive evaluations and recommendations, without follow-up policy and legislative changes, all of this dedication and hard work by legislators, town officials, citizens, and taskforce members will not protect the Sound from future "gold rushes" after this year has expired.

4) Tapping Unknown Informational Resources

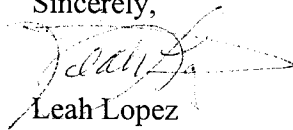
While we have had a number of excellent presentations on issues ranging from need to health, STS believes that despite publication of public hearings and despite the best efforts of all involved to invite a wide variety of presenters to workshops, there is a wealth of knowledge and information that has not been discovered, much less tapped into. It is the fear of STS that as the taskforce enters into this next meeting phase of process, public participation will decrease. A further effort should be made by each Taskforce to find willing participants/presenters with appropriate areas of expertise to ensure that extensive and reliable information is procured. This is necessary to allow members to provide the most informed and complete positions/recommendations possible.

5) Environmental and Need Issues

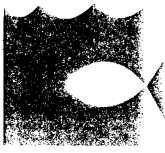
For a description of additional areas of concern for both environmental and need issues, please see STS' previously submitted, but in any event attached, comments on the RFP and Docketed matter.

Should you have additional questions or concerns, please feel free to contact me.

Sincerely,



Leah Lopez
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May 29, 2002

Ms. Louise Rickard
Executive Secretary
Connecticut Department of Public Utility Control
10 Franklin Square
New Britain, CT 06051

Re: Docket No. 02-04-23

Ms. Richard:

Save the Sound, Inc., (STS) is a regional non-profit membership organization dedicated to the restoration, protection and appreciation of Long Island Sound and its watershed through advocacy, education and research. Unfortunately, STS did not receive the Request for Written Comments issued May 10, and only very recently became aware of such a request. Due to this delay, we will be unable to provide more than a cursory comment on *Environmental Resources and Factors to be Considered* and *Environmental Effects*.

Task force Structure

Before moving forward on the questions posed in the request, STS would like to comment on the procedural/structural nature of the Taskforce. We are concerned that the combination of the three working groups (the LIS legislative group, the LIS Governor's group, and the Southwest CT overland group) might not be the best and most efficient way of furthering the objectives and goals of each unit. Individuals in the Governor's group are under a different time constraint than those serving on the Taskforce as per the Public Act. Additionally individuals in those groups working with the impacts on the Sound have a different scope and set of overall objectives than those dealing with the impacts to Southwestern Connecticut. These separate paths could detract from each group's mandated focus. While it is understood that some information may be shared, the majority of information, as related to need, location and impacts, will be vastly different—one incorporates the impact on marine life and energy need of Long Island as part and parcel of the plan, the other focuses on Connecticut's need and the environmental destruction to upland areas

Environmental Resources and Factors to be Considered and related
Environmental Effects



The following is a basic list of Long Island Sound related environmental resources and potential effects that must seriously be considered. We are willing to provide specific information, such as more direct locations of these resources, should they be need.

- a) shellfish beds
 - the overall extent and effect of sedimentation caused by the cumulative impact of the installation, operation and maintenance of potential projects
 - decrease in seabed stability and the relationship of that instability to the existence and proliferation of shellfish
 - possible disease outbreak caused by an increase of heat directly over important beds must be studied and thoroughly explored
- b) lobsters
 - migration impediment posed by exposed pipeline
 - migration impediment posed by both individual and cumulative electromagnetic fields
- c) multiple waterbody and wetlands throughout the state that will be impacted by the traversing of utilities from upstate connections to LIS. Preservation of existing wetlands should be a priority. An update of existing wetland acreage and significance should be mapped and reviewed in order to ensure critical areas are not trampled.
- d) essential fish habitats throughout the Sound must be clearly identified
- e) critical nursery and potential seed beds must be clearly identified
- f) time table for sensitive stages of life in LIS species (i.e. spawning, migration, larval stages, etc.) and the risks posed by construction, operation and maintenance should be mapped and assessed
- g) the possible disturbance of dredged materials disposed in the Sound, and effects of such disturbance must be analyzed
- h) the effects of project electromagnetic fields (individual and cumulative) on finfish (and other life forms that use the earth's magnetic field for positioning) must be studied and thoroughly explored
- i) the cumulative effect of blasting within the Sound
- j) the long term effect that the thousands of anchor holes produced by barges during the construction and/or repair of energy lines will have on floor stability and LIS ecosystem
- k) the effect of the trenched spoil mounds

- the effect of Long Island Sound's currents on such spoil mounds
 - the distance and extent sedimentation will occur should a storm dissipate such sediments before they are back filled
- l) the cumulative effects of multiple releases of non-LIS native drilling mud from numerous projects

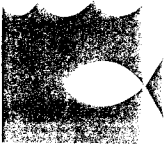
Additionally, a thorough analysis of the effects of other cross-waterbody energy projects (not merely within the confines of the State of Connecticut) should be reviewed to record the amount of destruction, or lack thereof, and to document both the successes and failures of known mitigation techniques.

Save the Sound would be pleased to provide more information on the above mentioned issues should the task force desire further explanation.

Sincerely,

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Cc: Mr. Joel Rinebold
Ms. Mary Healy



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May 30, 2002

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Mr. Joel Rinebold
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83 Windham Street
Willimantic, CT 06226

Re: Solicitation #02-01; Consolidated Project for the Protection of Long Island Sound

Mr. Rinebold:

Save the Sound, Inc., (STS) is a regional non-profit membership organization dedicated to the restoration, protection and appreciation of Long Island Sound and its watershed through advocacy, education and research. STS submits the following brief comments on the environmental information for Long Island Sound RFP.

Scope of Work

1. We understand that the list in 1(a-e) is not intended to be exhaustive, however, STS would request the addition of the following noteworthy areas of concern:

- (f) essential fish habitats throughout the Sound
- (g) significant wildlife habitat
- (h) migratory stop over areas
- (i) areas of significant lobster concentrations
- (j) critical nursery/seed shellfish beds

2. In addition to 1-4 in the 'Environmental evaluations, inventories and assessments', an inventory, mapping, and summary of contaminants of all dredged material disposal sites (both past and present) should be included. Such an addition would ensure that when making an evaluation of sensitive Long Island Sound areas, there will be sufficient information to ensure that no one project, or combination of multiple projects, will interfere with the cap material or the contaminated sediments below. For reference, much of this work has been preformed in combination with the EIS process for Dredge Material Disposal in Long Island Sound.

Existing Information and Data



1. For purposes of evaluating the regional "need" found in the survey sections 5 & 6, the New Jersey/ New York interconnects should also be included (i.e. Millenium Pipeline, other proposals that are in planning stages, other proposals that have failed because of need, or lack thereof, etc.).
2. Additionally, when evaluating 5 & 6, the survey should also include the life expectancy of each pipeline/cable at the surveyed carrying pressure/capacity.
3. Within #7's identification of consumer demand, the RFP calls for a survey of average and peak demand. We would request that there be a survey of the off peak structure as well. This would allow for a model to create potential load shifting availability and incentives.
4. Within the identifications of consumer demand, we would also suggest that not only load, but the nature of such loads be identified. For example, on the consumption end, if it is determined that business operations are consuming large amounts of energy to cool office space, an alternative to peak usage could be the already used practice of installing large scale icemakers. These machines then generate ice off peak and as this ice melts, it cools the building throughout the day (using no peak energy to cool). The water is then recycled that night for use during the following day. If the source of consumption is not mapped, then is difficult to understand where the potential for energy shifting lies.
5. Number 10's projection should give a standard from which to project. For example, does it presume the status quo of the past five years of growth, an increase of 10%, a decrease of 5%, etc.
6. In order to accurately provide for #12's assessment of our future ability to provide energy, there should be an assessment of the percentage and location of both NY & CT energy (i.e. x% of electric power from NY over x cable system is used in northeast CT). Without detailed information about 1) where NY & CT energy is coming from and 2) information on life-span of those existing pipelines/cables, the future assessment will be lacking.
7. The surveys discussed in this section, look at peak and average demands seasonally. We could suggest that a daily, weekly, or even monthly assessment would be better suited to determine potentials for alternative energy use.

Methods, Alternatives, and Strategies

1. In #13 after "brief assessment of technology including" add ***'but not based on'***.
2. In #15 after "impacts"; insert ***'including methods, options, and technologies that would completely eliminated the need to use Long Island Sound as a pathway'***.

Save the Sound would be pleased to provide more information on the above mentioned issues. Thank you for the opportunity to comment.

Sincerely,

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