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THE LEAGUE OF WOMEN VOTERS *of New York State*

January 7, 2015

Department of Transportation
Docket Management Facility
West Building, Ground Floor, Room W12-140
1200 New Jersey Avenue, S.E.
Washington, DC 20590-0001

Docket Submission for USCG-2013-0363

Dear Ladies and Gentlemen:

The League of Women Voters of New York State hereby submits that the Draft Environmental Impact Statement (DEIS) for the Liberty Natural Gas LLC, Port Ambrose Liquefied Natural Gas Deepwater Port License Application for the importation of natural gas is incomplete without inclusion of Liberty Natural Gas' financial status and its ability to take responsibility for the risks and hazards presented by this proposed project, the Port Operations Plan and absent an adopted policy which precludes import ports from being switched to export ports without an additional environmental impact review.

The Executive Summary states at page 10: "Financial responsibility is being evaluated within MARAD as a separate task that would be considered along with this draft EIS as part of the final licensing decision." We submit that the "financial responsibility" of Liberty Natural Gas represents information the public has a right to know so citizen-taxpayers can evaluate if Liberty Natural Gas has the financial resources to support such a large investment of construction and operation of the port, pipeline and two LNG regasification vessels, staff, offices, etc. and whether it carries sufficient insurance or sufficient on-hand cash reserves in case of accidents or malfunctions involving the Company's delivery of liquid natural gas to the port, regasification and further delivery of the gas to the existing Transco Pipeline.

The Executive Summary at page 10 also states: "Where applicable this draft EIS considers safety but does not function as the final safety evaluation. All aspects of Port safety would be addressed in the Port Operations Manual, which would require USCG approval prior to initiation of deepwater port operations." Current access to a Port Operations Plan would demonstrate to the public that a viable plan exists to address how these formidable vessels could navigate the shipping lanes, slow to turn to port or away from the port without significantly interfering with commerce as well as how they would operate under sudden severe weather conditions and particularly among the planned windmills.

On Oct. 16, 2014, MARAD proposed a change in policy “whereby any proposed Deepwater Port involving the export of oil or natural gas from domestic sources within the United States will require the submission of an **export-specific comprehensive license application** conforming to all established and applicable Deepwater Port licensing requirements and regulations.” This includes an Environmental Impact Statement. Comments were requested by MARAD on this policy.

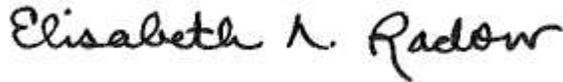
The League of Women Voters supports, in the strongest terms, this MARAD change in policy and even more strongly recommends this policy to be adopted and in effect before a decision to approve or disapprove the proposed Port Ambrose import port is made by the Maritime Administration of the Department of Transportation. Without the foregoing policy in effect, the USCG-2013-0363 DEIS and final EIS for an import port for this proposed project could be applicable for import or export and this outcome would be inconsistent with the intention of the proposed MARAD change in policy.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Sally Robinson".

Sally Robinson
President
League of Women Voters of New York State

A handwritten signature in cursive script that reads "Elisabeth A. Radow".

Elisabeth Radow
Chairperson, Committee on Energy, Agriculture and the Environment
League of Women Voters of New York State