

DRAFT LETTER

A recent City Council hearing was held on LNG. At this Hearing several questions were raised about the potential damage from an incident on an LNG ship. Estimates from 2,500 fatalities to 100,000 fatalities were discussed. It was also brought to my attention, at this hearing, that the United States Coast Guard (USCG) has accepted responsibility for managing the risk from LNG vessels. In fact, last year the USCG published regulations in this area in the USCG Circular, "Guidance on Assessing the Suitability of a Waterway for LNG Marine Traffic (NCIV 05-05).

This guide, along with the Sandia Labs report on LNG, which it references, would appear to be an excellent tool to use to analyze the potential hazard from an LNG incident in Boston Harbor. The results of such an analysis could greatly improve the Boston's ability to respond to an LNG incident. Although intended for new facilities it appears that it can be used for existing facilities. (See Section 6.c.)

*Section 6. c - "LNG facilities in operation prior to the publication of this Circular; Current safeguards and security measures for LNG terminals, including related LNG marine traffic, that were in operation prior to the publication of this Circular should be considered appropriate. **However, they are subject to case-by-case review if circumstances warrant.** Modification or expansion of existing facilities may be such a circumstance."*

Boston is in a unique situation relative to Marine LNG transit: 1) it is the only major city with LNG transit through such a congested area, 2) the only previous analysis used industry-generated data that differed substantially from the more recent and objective Sandia Lab data, and 3) the scope of the potential consequences is catastrophic. As a consequence, I strongly suggest that "circumstances warrant" applying USCG Circular NCIV 05-05 to the transport of LNG through Boston Harbor.

If the USCG determine not to apply USCG Circular NCIV 05-05 to Boston please explain with as many specifics as possible the logic supporting this decision. If the USCG determine to apply USCG Circular NCIV 05-05 to Boston please cooperate with City Agencies in developing the analysis.