



COMMONWEALTH OF MASSACHUSETTS  
**TOWN OF ACUSHNET**  
122 MAIN STREET, ACUSHNET, MA 02743  
**LNG ADVISORY COMMITTEE**

TEL.: (508) 998-0250  
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RE: Algonquin Gas Transmission, LLC's, Access Northeast Project  
Docket # PF16-1-000

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

May 25, 2016

Dear Secretary Bose:

As the Town of Acushnet, Massachusetts reviews the impacts to our community that will result from the Access Northeast project, I am writing today as chairman of the Town of Acushnet Citizens Advisory Committee on LNG (the "Committee") to urge the Federal Energy Regulatory Commission (FERC) to take certain actions. The Acushnet Board of Selectmen established the Committee to advise it on all aspects of the Access Northeast project.

As you know, since September 11, 2001, the concept of terrorism has become a daily reality for all Americans. Given the possible placement into a residential area of what would be the largest LNG storage facility on the east coast, the issue of terrorism is one of the major concerns of residents of Acushnet and neighboring communities.

On April 9, 2007, the Department of Homeland Security ("DHS") created the "Chemical Facility Anti-Terrorism Standards" under Title 6, CFR, Part 27. This action established risk-based performance standards relative to LNG facility security. On November 20, 2007, DHS quantified the chemicals of interest that initiate a Part 27 review. LNG in its gaseous form, methane, is on that list.

It is our understanding that LNG storage facilities regulated by Part 27 must participate in an initial review process termed "Top-Screen" which establishes the risk level of the LNG facility.

If this screening process determines that the potential for a terrorist attack could adversely impact human life and health, the designation as a "covered facility" would be assigned by DHS. Subsequently, DHS would assign the LNG facility a risk based tier ranging from Tier 1 (highest) to Tier 4 (lowest).

It is our further understanding that, secondary to this designation, a covered facility must initiate a Security Vulnerability Assessment for the purpose of identifying:

- 1) Hazard and consequences of concern for the facility and its surroundings.
- 2) Existing layers of protection.
- 3) Possible internal threats, external threats, and internally assisted threats.
- 4) Potential security vulnerabilities and existing countermeasures.
- 5) Strategies that reduce the probability of a successful attack or reduce the probable degree of success.

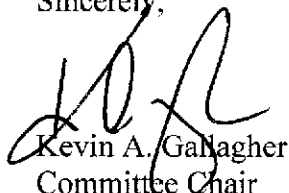
It is understood that following the submission of a Security Vulnerability Assessment a final determination is made by DHS as to the covered facility status of an LNG facility. If the covered facility remains, the facility is responsible for developing and submitting to DHS for approval a plan which would list the measures to be used to mitigate the terror related vulnerabilities identified.

Needless to say, this Committee strongly recommends that FERC coordinate with other federal stakeholders to review the Acushnet component of the Access Northeast proposal for the purpose of determining the necessity of a Part 27 review. Given the quantity of LNG which would be stored in a residential setting if the project is allowed to proceed, we believe, based on a review of the Environmental Impact Statement issued in Docket #CP08-13, that the proposed quantity of methane on site would trigger the Part 27 review process.

While the Access Northeast project must comply with the security requirements found in 49 CFR 193, Subpart J, it is our firmly held belief that the overall security of this community is enhanced by a full Part 27 review which we expect will result in the implementation of a DHS approved security plan addressing possible acts of terrorism. We respectfully request that this review be initiated as soon as possible.

Thank you for your attention to this matter of concern.

Sincerely,



Kevin A. Gallagher  
Committee Chair  
Fire Chief, Town of Acushnet