



**Our World  
Depends on Us.**  
NEW YORK

July 12, 2022

Erin Gorman  
Manager, Environmental Projects and Permitting  
PSEG  
175 East Old Country Road, Hicksville, NY 11801

Dear Ms. Gorman:

The Nature Conservancy (Conservancy) wishes to express our concern regarding the proposed PSEG Bridgehampton-to-Buell Underground Cable Project. The Long Pond Greenbelt (LPGB) has a long history of public support to protect it and together with a multitude of partners, including Suffolk County and the Town of Southampton, the Conservancy succeeded in preserving over 600 acres of this unique and important continuous chain of coastal plain ponds in an area of intense developmental pressure. The LPGB is a unique expanse of interconnected coastal plain ponds, freshwater swamps, wetlands, fields, and woodlands, supporting one of the highest concentrations of rare species and natural communities anywhere in New York State (NYS), including at least three known breeding ponds of the NYS endangered tiger salamander. Additionally, the NY Natural Heritage Program has identified significant natural communities and records of fourteen rare, threatened, and endangered species on or in the vicinity of the proposed project route.

According to the project DEIS, in the areas of greatest sensitivity, the cable will be installed via horizontal directional drilling (HDD), while most of the cable, approximately 80%, will be installed via open trench. The Conservancy appreciates the efforts being made to avoid impacts to sensitive freshwater habitats and the species dependent on them through HDD, but one must recognize that these species are not solely dependent on freshwater habitat. Species such as the tiger salamander, *Ambystoma tigrinum*, a New York State endangered species that only occurs in New York State on Long Island, spend most of their lifecycle below ground, often well over a 1000' from their breeding ponds, only surfacing to migrate for a short time to breed. Open trenching has the potential to result in significant direct take of this imperiled species. Additionally, the project requires the clearing of 0.9-acre, including within 535' of a known tiger salamander breeding pond, well within the distance the species spend nearly all its life. The DEIS states, "Most of the species that utilize the Proposed Action Area are those that are somewhat tolerant of human activity. While it is expected that wildlife will be temporarily displaced during the construction phase of the Proposed Action, no permanent displacement of wildlife will result from operation of the underground cable." This may be true for many

mammalian or avian species, but for some of the more sensitive species that are subsurface, permanent displacement or direct take is likely. The installation of a 3.9-mile road of recycled concrete aggregate (RCA) for machinery access, even if temporary, will undoubtedly negatively impact habitat and wildlife.

The ponds in the LPGB are groundwater fed and it remains unclear how this project, particularly HDD, will impact the hydrology of this important freshwater system. Three freshwater wetlands within the Long Pond Greenbelt directly intersect the Proposed Action Area. The Great Swamp wetland complex is identified as a temporary conduit laydown area. What are the impacts, even temporary of conduit laydown in Great Swamp? The DEIS identifies a long list of activities that have the potential to adversely impact water resources: trenching for cable installation, grading, vegetation clearing, road stabilization, manhole installation, and inadvertent release of HDD fluids. Although this fluid is to contain non-hazardous components, the DEIS acknowledges that an inadvertent release of drilling fluids could potentially affect surface waters and wetlands.

In addition to surface water environmental impacts, there are significant concerns regarding impacts to the sole source aquifer which millions of Long Islanders depend on for drinking water. In total, the proposed project is within five Critical Environmental Areas (CEA), four of which are recognized as CEAs as defined by 6 NYCRR 617.14(g) of the State Environmental Quality Review regulations and one of which is designated by the Town of Southampton. A list of each CEA and its reason for designation is provided below, taken directly from the DEIS:

- South Fork Special Groundwater Protection Area (SGPA) (located in the Town of Southampton and Town of East Hampton) – This CEA was designated by the Long Island Regional Planning Board on March 19, 1993, in order to protect groundwater.
- Aquifer Protection Overlay District (located in the Town of Southampton) – This CEA was designated by the Town of Southampton on June 20, 1983, to preserve the water quality of the area.
- Long Pond Greenbelt (located in the Town of Southampton) – This CEA was designated by Suffolk County on February 10, 1988, as it was recognized as a benefit to human health and to protect drinking water.
- Water Recharge Overlay District (located in the Town of East Hampton) – This CEA was designated by the Town of East Hampton on February 12, 1988, to protect groundwater and drinking water.
- Town of Southampton Freshwater Wetlands (located in the Town of Southampton) – This CEA is designated as per the Town of Southampton Town Code. It includes all freshwater wetlands within the town subject to Article 24 of the Environmental Conservation Law (ECL). The designation was added to Town Code on May 8, 1990.

From the DEIS, “In general, all of the CEAs in which the Proposed Action intersects are for the protection of groundwater/drinking water or surface.” Any project with the potential to negatively impact the sole source aquifer to this extent must be heavily scrutinized.

Mitigation and restoration activities identified in the DEIS include restoring areas disturbed during cable installation with suitable native plantings. While use of native plantings is appreciated, disturbance often allows for non-native species to colonize and despite best efforts to prevent the inadvertent introduction of non-native vegetation, it often occurs. The restoration of the tiger salamander upland habitat within 535’ of a known breeding pond will occur as well, with the same concerns existing. In order to obtain an Incidental Take Permit from the NYSDEC for the species, PSEG must show a net conservation benefit. As such, they have identified approximately 0.39 acres of sub-optimal habitat on the east side of Bridgehampton-Sag Harbor Turnpike owned by the Village of Sag Harbor to be restored to more suitable native habitat. Restoring the Village parcel does not ensure use by the aforementioned rare, threatened, and endangered species on or in the vicinity of the proposed project route. Besides agreements for restoration, PSEG needs to secure an agreement that the Village will maintain this parcel in perpetuity for the benefit of tiger salamanders and associated species.

The Conservancy understands and appreciates the need for new electric transmission infrastructure as we transition to more renewable energy sources. However, ensuring environmentally sensitive areas such as the Long Pond Greenbelt are protected must be considered in siting new transmission projects to meet this increasing demand. The Conservancy requests that alternative routes be fully explored and exhausted and that the least impactful route to the critical resources of concern be chosen. The environmentally sensitive Long Pond Greenbelt was acquired for the very purpose of protecting these resources with significant investment of public and private dollars and this commitment of multiple agencies, organizations, and partners should not be disregarded.

If you would like to discuss this further, please do not hesitate to contact me at (631) 367-3225 ext. 122 or via e-mail at [jjanssen@tnc.org](mailto:jjanssen@tnc.org). The Conservancy looks forward to working with PSEG to find a workable solution that meets our growing energy needs while protecting our most important natural areas.

Sincerely,

A handwritten signature in blue ink that reads "Joseph Janssen". The signature is written in a cursive, flowing style.

Joseph Janssen  
Conservation Lands Director



June 29, 2022

Attn: Erin Gorman, Manager, Environmental Projects and Permitting  
175 East Old Country Rd  
Hicksville, NY 11801  
Via email: PSEG-LI-B2BSEQR@pseg.com

167 Red Creek Road  
Post Office Box 939  
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11946

Ph (631) 653-4804

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[peconicbaykeeper.org](http://peconicbaykeeper.org)

**Re: Bridgehampton to Beull Underground Cable Project**

Dear Whom It May Concern,

I am writing on behalf of Peconic Baykeeper, an environmental non-profit dedicated to the protection of ground and surface waters of Eastern Long Island to share concerns over the proposed underground transmission cable through the Long Pond Greenbelt. As was expressed so eloquently by those in attendance at the public hearing on June 28<sup>th</sup>, the Long Pond Greenbelt is a truly remarkable tract of preserved land including an array of rare, threatened, and endangered species. Most importantly, this area has been thoughtfully preserved by an array of dedicated individuals and organizations that had the foresight to recognize that this fragile habitat could be permanently lost.

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As a lifelong resident of the East End with family ties going back to colonial times, I have witnessed the piecemeal and wonton destruction of both our woodlands and coastal habitats. This has not only resulted in irreparable harm to our ecosystems, but has also threatened the integrity of both our ground and surface waters; the lifeblood of the East End community. Areas fortunate enough to be preserved such as the Long Pond Greenbelt should in all cases, be treated as hallowed ground; left to let nature be nature and for our community and future generations to enjoy.

Any project taking place in protected and fragile habitat, however well intentioned or deemed as necessary, carries risks and this is clearly outlined in the plans. One death of our endangered eastern tiger salamander is too much. One drop of contaminants into our coastal plain and vernal ponds is too much. One chance that something may go wrong and undermine the work that so many have done to preserve this habitat as well as protect our groundwater for future generations is a chance that should not be taken.

It is easy to see how the clear and direct path for the transmission line underground through the critical habitat protected by the Long Island Greenbelt is an attractive option as it is the path of least resistance. It is also however, the path that carries the greatest environmental risk and the potential for irreparable harm. In closing, I urge PSEG to respect the sacredness of our preserved land, to listen to the wise voices in the community who unanimously oppose this project and please seek an alternate route to protect our ecosystems, community, and our groundwater.

Sincerely

Peter Topping  
Executive Director & Baykeeper





July 13, 2022

Via E-mail: [PSEG-LI-B2BSEQR@pseg.com](mailto:PSEG-LI-B2BSEQR@pseg.com)

Erin Gorman  
Manager, Environmental Projects and Permitting  
PSEG Long Island  
175 East Old Country Road  
Hicksville, NY 11801

**Re: Bridgehampton to Buell Underground Transmission Cable**

Dear Ms.Gorman,

Thank you for the opportunity to provide comments regarding the subject project.

For your consideration, Defend H2O is a Sag Harbor based environmental non-profit organization dedicated to clean water and habitat protection on Long Island. As its founder, a credentialed biologist and environmental professional with extensive experience in wetland permitting, I'm qualified to speak to this matter. Recognizing the unique physical characteristics and ecological sensitivities of the Long Pond Green Belt, Defend H2O joins the chorus of opposition to the proposed project.

Although I was not present at the June 28 public hearing, I was able to watch the proceeding on Youtube and was moved by how informed and articulate many of the the speakers were. Thoroughly addressing the unique characteristics of the Long Pond Greenbelt, potential environmental impacts and providing compelling arguments why PSEG should abandon plans to employ horizontal directional drilling (HDD) under wetlands in favor of physical avoidance.

While I concur with much of what was stated during the hearing, I wish to resonate relevant technical issues that are at the core of the matter. Specifically, concerns raised by Frank Quevedo, Executive Director of the South Fork Natural History Museum regarding the potential impacts to wetlands from HDD, and potential disturbances to reptiles and amphibians from the electro-magnetic fields (EMF). Two critically important questions which must have absolute certainty as to deminimus impacts. However, unfortunately do not.

Following review of the SEQRA documents I had two immediate impressions. First, project scoping was framed in a generic way without specificity to location and unique resources present. Secondly, the DEIS examination of EMF on wetland community biota was grossly deficient.

July 6, 2022

**FRIENDS OF THE  
LONG POND  
GREENBELT**

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Larry Penny  
Peter Wilson

*Honorary Directors*

Jim Ash  
Barbara Bornstein  
Priscilla Ciccariello  
Jackson Dodds  
Diane Lewis

Established in 1997, FPLG  
is a 501c3 not-for-profit  
organization dedicated  
to the preservation,  
stewardship, and public  
appreciation of the Long  
Pond Greenbelt in the  
Town of Southampton,  
on the East End of Long  
Island, New York.

Federal EIN number:  
11-3527432

NYS Charities Bureau  
registration number:  
40-16-86

Erin Gorman  
Manager, Environmental Projects and Permitting  
PSEG Long Island  
175 East Old Country Road  
Hicksville, NY 11891

PSEG-LI-B2BSEQR@pseg.com

Dear Manager Gorman,

Friends of the Long Pond Greenbelt (FLPG) strongly opposes the Bridgehampton To Buell PSEG Long Island proposal to drill an underground transmission cable using Horizontal Directional Drilling (HDD) through the Long Pond Greenbelt.

As the Draft Environmental Impact Statement amply demonstrates, this project will have a profoundly deleterious impact on the rare coastal plain pond ecosystem that characterizes the Long Pond Greenbelt.

The project as proposed, using HDD from the Bridgehampton/Sag Harbor Turnpike to Widow Gavits Road, will unquestionably

- degrade habitat used by rare, threatened and endangered species and species of special concern
- remove a portion of a designated significant natural community including an area of the Great Swamp complex
- create a temporary loss of a recreational resource
- negatively impact the unique ecosystems and natural communities that characterize the Long Pond Greenbelt and which led to its designation by Southampton and Suffolk County as a Critical Environmental Area.

More specifically, the EAF and DEIS identify these issues:

- a vernal pond, breeding site for the state endangered tiger salamander
- another tiger salamander breeding pond near the proposed staging area to the west of the BH/SH turnpike
- the wetlands of the vernal ponds as well as Long Pond and its adjacent vernal pond will be impacted.
- the stream between Long Pond and Deer Drink/Crooked Pond forms a natural connection of coastal plain ponds affecting the entire coastal plain pond system. Drilling here will reverberate through this system.
- construction noise will impact the preserve, its animals and nearby residences
- fishing and hunting access to Long Pond and the use of nearby trails will be disrupted for possibly as long as a year.
- use of 15,000 gallons of water/day with liquid wastes/slurry
- air emissions
- clearing and digging for the staging site and manhole

*Friends of the Long Pond Greenbelt is dedicated to the preservation, stewardship, and public appreciation of the unique expanse of coastal plain ponds, freshwater swamps, wetlands, and woodlands in the Town of Southampton known as the Long Pond Greenbelt, which stretches from Ligonee Creek in Sag Harbor to Sagg Pond in Sagaponack. The New York Heritage Program identifies many of the Greenbelt's ponds, fauna, and flora as rare within New York State and worldwide.*

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The DEIS completely overlooks the fact that the two properties owned by Southampton Town that abut or are transected by the project enjoy the special legal protections conferred upon parcels dedicated to the town's Nature Preserve program.

Another problematic item in the DEIS has to do with whether the project site adjoins property which is now or was at one time used as a municipal waste facility. The DEIS claims NO. But the Sag Harbor Village property that the right-of-way passes across was once the Sag Harbor Village dump and to date has not been remediated. A portion of the property is currently leased by Southampton Town and contains one of the town's transfer stations.

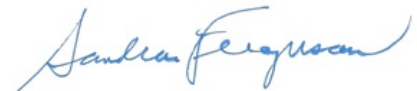
The Long Pond Greenbelt, targeted as early as 1970 as a preservation focus by Southampton Town, Suffolk County and The Nature Conservancy has been assembled parcel by parcel over the succeeding decades until today when it comprises over 1,100 protected acres. A local conservation triumph. This extraordinary effort was propelled by the desire to protect for future generations the unique natural communities of the interconnected chain of rare coastal plain ponds and pond shores that span the entire six-mile length of the Long Pond Greenbelt.

An assault on one portion of this intricate, interrelated chain of coastal plain ponds is an assault on the entire ecosystem. This project can have unknowable and irreparable damage to this unique and fragile nature preserve. It is crucial that the route passing through the Long Pond Greenbelt be abandoned. Proposed Alternative Route 3, the Southern Underground Route, that would trench underground south along the Bridgehampton/Sag Harbor Turnpike and east on Montauk Highway, would have the least impact on this rare and irreplaceable nature preserve.

Sincerely,



Dai Dayton



Sandra Ferguson

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While the DEIS provided a broad discussion of how HDD will avoid wetland impacts, there was little discussion on potential hydrological effects from drilling beneath wetlands and no discussion on EMF effects on the resident biota.

My perspective is based on recent experience participating in public review of the South Fork Wind Project where potential impacts associated with HDD and EMF was substantively addressed in the DEIS. In particular, impacts on fish populations and migration from EMF. The subject DEIS does not provide the same rigor of analysis and should be amended so an objective assessment of the overarching concerns can be accurately rendered.

In closing, given the environmental uniqueness of the Long Pond Greenbelt, level of protection already afforded through multi-government actions and the looming uncertainty of HDD and EMF impacts, Defend H2O strongly urges PSEG to discard the plan to employ HDD and instead opt for an alternative route (plan).

“Do no harm,” a principle which above all else should direct project design.

Thank you for your consideration to these comments.

Respectfully yours,

A handwritten signature in blue ink that reads "Kevin McAllister". The signature is written in a cursive, flowing style.

Kevin McAllister  
Founder & President

cc:

Honorable Fred Thiele, New York State Assemblyman  
Honorable Bridget Fleming, Suffolk County Legislator  
Honorable Jay Schneiderman, Town of Southampton Supervisor  
Dai Dayton, Friends of Long Pond Greenbelt



## **Desecration Of Nature**

My grandparents bought land, around 1920, which is now the Anna and Daniel Mulvihill Preserve. They cherished and protected all of its species. My father, William Mulvihill, bought adjacent parcels, including the Great Swamp, to guard its precious groundwater and diverse habitats. A man ahead of his time, he realized then that these treasures would soon be in grave danger.

Now we are faced with a local emergency. PSEG Long Island wants to clear land in the Great Swamp to facilitate installation of an underground transmission cable right through critical ecosystems. Yet an alternative route exists for the underground cable, along roadways.

The very land protected by my family could now be violated by our own utility company and sold out by the Town of Southampton, which vowed to safeguard it for future generations.

Taxpayers bought the William Mulvihill Preserve with Community Preservation Fund revenues, and it belongs now to everyone's family, for hiking, birding, finding peace and beauty, and teaching children to revere nature.

For decades, my elders shunned developers who tried to tempt them with large sums, who sought to divide this wilderness. They resisted, knowing you can't put a price on owl habitat, on rare salamanders or orchids, on refuge for our vanishing box turtles. You can't quantify clean drinking water in our aquifers on an island that hosts millions of people. You can't appraise a kettle bog, teeming with species, or a forest rich with migrating birds, butterflies, native plants and mammals, especially as we all bear witness to a worldwide biodiversity crisis.

PSEG's plan is short-sighted and dangerous. They acknowledge they would need to "remediate" vernal ponds and endangered Eastern tiger salamander habitat. Extinction cannot be remedied. You cannot replace a vernal pond once destroyed. A plethora of lifeforms lie hidden in its primal soil for most of the year. It cannot be moved or replicated. Vernal ponds are ancient gems of Great Swamp and the Long Pond Greenbelt, critical for ecological integrity.

My dad wrote about his land: "The vernal pond is a crucible where only the fittest amphibian, insect or microbe survives to endow their progeny with their traits. Vernal ponds are critical havens for migrating amphibians that travel over land seeking new homes. For that reason alone, they must be protected."

Turtles need them in their search for egg-laying sites. Dragonflies that emerge from them nourish countless songbirds.

This threatened desecration of our nature preserves must be stopped now. "Horizontal directional drilling," producing daily "liquid waste/slurry" can never be allowed in our wetlands.

Please contact the Southampton Town Board and Suffolk County to beseech them to not give these rights-of-way to PSEG. They hold the cards. We, the public, their constituents, must stand firm.

Mary Ann Mulvihill-Decker

Sag Harbor

Dear Ms Gorman,

I have followed the proposed Buell underground cable controversy closely as I am a nearby neighbor of the proposed project having lived on The Bridgehampton Sag Harbor Turnpike for 34 years.

The protection of The Long Pond Greenbelt ecosystem is of paramount importance and no project ,particularly one of such dubious origins, should be undertaken without a full and complete vetting of the projects shortcomings.

The primary reason given for this endeavor was to offset 'projected" increases in electrical demand in the coming years in East Hampton Town. With the recent announcement by East Hampton Town that it is moving to require all new construction to conform to strict energy saving mandates,it would appear that the stated primary reason for the project is no longer valid .

Hopefully this will be the end of the discussion of this controversial proposal, and PSEG will take this project off the table and apply their resources more appropriately elsewhere.

Most sincerely,  
Preston T Phillips  
Bridgehampton, NY 11932