



CITY OF NEW YORK

MANHATTAN COMMUNITY BOARD FOUR

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COREY JOHNSON
Chair

ROBERT J. BENFATTO, JR., ESQ.
District Manager

March 6, 2013

Kevin Burke
Chairman, President, and Chief Operating Officer
Con Edison Consolidated
Cooper Station
P.O. Box 138 New York, NY 10276

Gregory L. Ebel
President and Chief Executive Officer
Spectra Energy
5400 Westheimer Court
Houston, Texas 77056

Re: Spectra Pipeline - in Manhattan

Dear Mr. Burke and Mr. Ebel:

Manhattan Community Board 4 (MCB4) is writing about the Spectra Pipeline Project, being constructed by Con Edison, and in particular the portion on Tenth Avenue between Gansevoort and W15th Streets, affecting one-block in Manhattan Community District 4. We are deeply disappointed and disturbed that this project has gone forward, against the wishes of our neighbors in Manhattan Community Board 2, without adequate public review and response to that review. We will confine our comments to the portion that affects our district, but want it to be known we oppose the decision to go forward with this project without:

1. Quarterly demonstration of the safety of the Con Edison system;
2. Quarterly testing and public disclosure of that testing for numerous contaminants in natural gas with particular focus on the presence of radon, and
3. An aggressive effort to develop and install alternative energy sources by Con Edison as well as by Federal, State and Local agencies and enterprises.

Having been involved in the planning of PlaNYC 2030 we have applauded the City's decision to phase out the dirtiest of oils, grades 4 and 6. We understand this pipeline is required by an increase in population and by the transition to natural gas from oil for heating and hot water. We understand that Con Ed is in charge of its infrastructure and not the characteristics of the gas sent through its pipes. However, none of that alleviates serious concerns.

It is clear to us that this project has momentum and is moving forward. It also is clear to us that given the circumstances presented it would be irresponsible to oppose this addition to Con Ed's supply without offering a currently available alternative to energy supply in NYC. However, because of the short-sightedness of the decision makers we are given an apparent Hobson's Choice and then told to be responsible and choose it since natural gas is a better fuel source than Grades 4 and 6 oil and therefore our only option ("apparent" because we put aside consideration of number 2 oil which may be cleaner burning than natural gas and contains biodiesel).

The issue of the Spectra Pipeline and the concerns posed by natural gas and the hydrofracking process are not new to MCB4. We submitted a letter to the Federal Energy Regulatory Commission (FERC) on November 3, 2011 requesting that the Con Edison portion of the project be included in the Final Environmental Impact Study and that certain serious concerns be addressed (see Attachment A). We submitted a December 12, 2011 letter to NYS Governor Andrew Cuomo detailing our concerns with hydrofracking in the upstate region (see Attachment B). On July 12, 2012 the Waterfront, Parks and Environment Committee held a public meeting on the Spectra Pipeline issue (see Attachment C) and again on the evening of February 14, 2013.

Safety of the Con Edison System

It is our understanding that Con Edison receives gas at 350 lb per square inch (psi), stepped down from higher pressure by Spectra in NJ and then heats it to 50o Fahrenheit. Con Ed has been managing 350 psi in its lines for quite a number of years: their gas distribution system consists of 88 miles of what it calls transmission pipes carrying gas at 350 and 245 psi. There are weekly inspections of the pipes outside of Manhattan and daily inspections of the 14 miles of pipes in Manhattan. These transmission pipes feed 4,323 miles of distribution pipes. Gas is distributed to residents at lower pressure. Between each stage there are regulators stepping down gas pressure for the next part of the distribution system.

Con Edison's safe management of its gas transmission remains an obvious concern. Despite assurances that the infrastructure in place can handle the pressure it receives, we request quarterly official reporting of safety tests on the Con Edison gas distribution system. We request clarification as well as assurances the gas flowing at any pressure does not pose an explosion risk to our community.

Testing for Hazardous Materials

It was revealed to us that Con Edison is not required to test for radon or any other impurity in the gas it receives from providers. FERC and the relevant state and city agencies do not require it. The fact that the FERC does not require testing for radon levels does not excuse either Con Edison or Spectra from the due diligence of ensuring that a safe product is delivered to its customers. We believe that Spectra and Con Edison should be required to monitor the presence of hazardous materials. Although fracking is not yet happening in NYS, it is happening elsewhere.

Con Edison representatives have told us that fracked gas already is in the natural gas we use, and that its radon content as well as other contaminants is negligible. Despite this we would like a periodic statement by an independent body reporting the test results for radon, and a list of other impurities potentially found in the gas we use to cook. Community Board 4 believes it crucial that quarterly testing for the numerous constituents within natural gas be performed and reported to the public and included in monthly customer bills.

Alternative Energy Sources

We are disappointed that we are being presented with the single option of increasing the supply of natural gas to New Yorkers. We believe that an enlightened energy policy would have presented the community instead with a series of options, including the development of solar energy and other alternatives. At the very least, every school and community center should have solar collectors on their roofs as the price has become more affordable.

We realize that developing alternatives is not uniquely the responsibility of Con Edison, but we would like to know what Con Edison is doing to promote wind and solar energy as well as any potential plans to modify the current infrastructure to handle increased usage of alternative energies. Without a commitment to a better energy policy we cannot look at the extension of this project into our district as anything then a bad omen for our City.

We are compelled to request that Con Edison take a more responsible approach to providing safe energy including a significant amount of alternative (i.e., solar) energy to its customers.

We will continue to be involved as we work to ensure that our concerns regarding the potential impurities in natural gas are addressed and that there is a significant increase in the number of solar energy sources in NYC.

Sincerely,



Corey Johnson
Chair

cc: FERC
John Banks, Patricia Ricardi, David Gmach - Con Edison
New-Jersey-New York Pipeline
NYC Council Speaker Christine Quinn
Congressman Jerrold Nadler
Manhattan Borough President Scott Stringer
State Senator Brad Hoylman
State Assemblyman Richard Gottfried
NYS DEC
NYC DEP