



CITY OF NEW YORK

MANHATTAN COMMUNITY BOARD FOUR

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

November 3, 2011

Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Room 1A
Washington, DC 20426

RE: Docket No. CP11-56-000, New Jersey/New York Expansion Project

Dear Ms. Bose,

Manhattan Community Board 4 respectfully requests that a number of issues be addressed in the Environmental Impact Study for the Spectra NJ/NY natural gas pipeline expansion project. This project would bring a new 30-inch high pressure transmission under the Hudson River into Manhattan. As part of this project, Con Edison would install a new pipeline, roughly 1500 feet long, from the intersection of Gansevoort Street and Tenth Avenue to West 15th Street, in the southwest corner of our community district.

Con Edison already operates a 20-inch gas main along 15th Street, which was never rebuilt to accommodate this pipeline. The west end of this street, where the connection would be made to the new pipeline, is in an area with a great deal of underground water, due not only to underground streams but to the fact that this area used to be under the Hudson. The segments of 15th Street between Eighth and Tenth Avenues run alongside two large office complexes, 111 Eighth Avenue and Chelsea Market, and as a result the street is frequently torn up so that new utilities can be laid. There is considerable potential for damaging the gas pipeline, which is covered by a series of small steel plates.

There have been a number of gas pipeline failures in the last several years. Although the most dramatic was in San Bruno California, where eight people were killed, there have been two serious failures in Manhattan and three in Queens since 2007. The result was one death and twenty injuries. It can be thus argued, it is difficult or impossible to avoid accidents related to gas pipeline failures.

Manhattan Community Board 4 asks that this new 1500-foot pipeline be included in the Final Environmental Impact Study. In particular, we would like the study to ask if the size of the proposed pipeline could be reduced to decrease potential damages from an accident, and if the pipeline could be buried at a greater depth than is currently planned. We also ask that more research be conducted on the future demand for natural gas in New York City, to justify this large new project, including possible

alternatives such as conservation. In addition, we would like the study to examine the traffic impact of several extensive construction projects on 15th Street. To be precise:

What kinds of detours will be proposed, what kinds of barricades and flagmen; what disruptions in other services?

Will there be any impact on the existing gas main along 15th Street; is it currently performing up to standards?

By what routes will excavated debris be taken from the construction site?

Given that this community recently lost St. Vincent's Hospital and diminished capacity to rapidly respond to medical emergencies, the community board also respectfully request that the FEIS address what emergency medical care operation plan in the event of an accident with the new pipeline.

Manhattan Community Board 4 thanks the Federal Energy Regulatory Commission for receiving public commentary and looks forward to receiving a preliminary response to this letter and regular progress reports regarding the pipeline installation from your office.

Sincerely,

A handwritten signature in blue ink, appearing to read 'CJ', with a long horizontal flourish extending to the right.

Corey Johnson
Chair