

Subject: Unabridged Text of presentation given at DOC Hearing 11/13/02

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Secretary Donald Evans
Dept of Commerce
Washington, D.C.

11/13/02

Dear Secretary Evans

The Millennium pipeline is a poorly conceived pipeline. After spending 5 years perfecting their pipeline route, Millennium plans to route this pipeline through the fragile and important Haverstraw bay habitat. It will pass 2 ft. from a 90 year old aqueduct supplying 40% of the drinking water to NYC, and would cut down 10% of the trees in a NYC watershed that filters the water 9 million people drink. It would run perilously close to the Con Edison electric lines where an explosion from whatever cause, would cut off 40% of New York City's electricity, and expose 1900 Briarcliff school children to incineration, while exposing hundreds of families to carcinogenic dioxin dust. All of these impacts occur in the Coastal Zone or affect the coastal Zone. Thus, the NY DOS was right to find Millennium inconsistent with the Coastal Zone Management Act. New York State's determination should be sustained. New York knows how best to manage its important resources for the benefit of the people and the region, and did not adopt a mindless "we need energy at any cost" notion.

Absence of Need

The problems with this pipeline route are bad enough, but this pipeline is not even needed. There are 9 pipeline expansions specified in the New York State Energy Plan 6/2002 that will bring an additional 450,000 dekatherms of natural gas to the NY downstate region by Nov. 2003. The energy plan said "if no post -2003 pipeline projects are built (other than these already approved projects), the existing gas and oil systems will be adequate to meet all generation scenarios." An additional "10" pipeline projects are planned, not including Millennium, that would bring more than 2.8 million dekatherms of gas. This is 3.5 times more than the 800,000 dekatherms that NY State energy plan cites as needed to satisfy 100% of all contingencies to 2005 and beyond. If all the new gas burning electric plants are not built for lack of funding, as suggested by the NY Independent Systems Operator, even less gas would be needed. This may be the reason that the recently certified Iroquois Eastchester Expansion project, according to Jim O'Connell of Con Edison, has asked for an amended certificate from FERC to ship half of its 230,000 dekatherms because of anticipated decreased demand. Thus, Millennium is far from unique, and the need for any single pipeline project should be seriously questioned. Several of these projects will be eliminated because of competition for this oversupply of gas, or because of their overriding impacts on the environment and population. Millennium is clearly not needed and has egregious impacts.

In addition, the idea that millennium would increase our nations self sufficiency is undermined by the fact that this gas originates in Canada, not domestically.

Site description in Briarcliff Manor.

The approved pipeline creates a unique and dangerous juxtaposition or

convergence of this high pressure/large diameter natural gas pipeline with the Taconic State Parkway, all the Briarcliff Schools, and the Con Edison High Voltage Electric Corridor that supplies 40% of the electricity to New York City and much of Westchester. The Con Edison High Voltage Electric Corridor is both located in the Coastal Zone and affects the Coastal Zone. The Taconic State Parkway is a major evacuation route for Indian Point, also in the coastal Zone.

The distances from the pipeline to the various structures are important to understanding the impacts. It is the interaction of these structures that is at the heart of why there would be so many impacts.

The pipeline throughout this area hugs the southbound lane of the Taconic Parkway. Todd Elementary school is 140 ft. from the pipeline and the playground is 75 ft. away. The Briarcliff Middle and High School are 600 feet from the pipeline and the playing field 350 ft., all within an area of non survival in the event of an accident or attack. The Con Edison High Voltage corridor is 500-700 feet from the pipeline in the area next to Todd School, and actually crosses over the pipeline next to the Middle and High School.

Additionally, the Pace University Campus is located approximately 900 feet away from the pipeline.

At the Center of this Convergence is the Millennium Pipeline-a Potent energy Source

These distances between structures have relevance given the destructive potential of a 24 inch diameter/1000 psi natural gas pipeline from an explosion from whatever cause. This is indeed what the PSCNY considered when it said in the FERC FEIS 10/2001 "THE PSCNY PREFERS TO HAVE THE PIPELINE LOCATED AS FAR AWAY AS 1500 FEET FROM THE CON ED RIGHT-OF-WAY." (Millennium Pipeline FEIS 10/2001 pg 6-13, item#6)

It said this when the PSC was concerned with the potential physical damage to Con Edison's Extra high voltage power lines and steel towers from the danger of a gas explosion.

To help understand why the PSC said this consider

- 1) The combination of High Pressure and Large Diameter means, that by calculation, a break in such a pipeline would liberate gas by a factor of tens of millions of times more in comparison to a leak in a home gas line
- 2) In 1994, the Edison N.J. high pressure pipeline explosion leveled apartment buildings as far away as 1500 feet.
- 3) In August 2000, a New Mexico high pressure pipeline exploded, killing 12 people, most of whom were within 900 feet from the blast center. In the 59 minutes that the flames were lit, 500 feet away from the epicenter was a bridge whose concrete structure was turned to powder. At that riverbed, sand was turned to glass. The temperature required to do this was at least 2600-2900 degrees Fahrenheit

It is not surprising that such damage could occur so quickly, since after an incident has occurred, the response is limited by the fact that valves in such pipelines are located from 2.5 to 4 miles between valve closure points, allowing large reservoirs of gas at decreasing pressure to leak and burn for extended periods of time, the heat from which is traveling at the speed of light in the form of visible and infrared light. Thus damage to surrounding structures are almost immediate and thus largely unaffected by pipeline safety systems which act too late.

From the recent example of the WTC towers on 9-11, the temperature was estimated to be 2000 degrees Fahrenheit. The South Tower fell when the structural steel failed after 45 minutes. These temperatures also help to understand why no evidence of most of our 3000 fellow Americans were found at the site.

Impacts on the Coastal Zone because of structural interactions in the Briarcliff Area

1) Consider The Taconic State Parkway converging with the Millennium Pipeline.

In rural settings, relatively harmless nonexplosive leaks could occur that might not detonate, or if they did, little collateral destruction would occur. But on an active highway, like the Taconic State Pkwy, every single car could serve as an ignition source. Ignition would be likely given that cars would be at different distances from the rupture site at varying air to gas mixtures.

If ignition occurred, the Con Ed electric lines would be destroyed eliminating 40% of the electricity to the Coastal Zone, since they are too close.

The Taconic parkway would be destroyed which is a major evacuation route for Indian Point Nuclear Facility. The Con Ed electric supply would be cut off. 1900 school children would be incinerated.

2) Consider The convergence of the Con Edison High Voltage Electric Corridor and the Millennium Pipeline.

The ConEd high voltage power lines and structures either cross the proposed pipeline route or are within 700 feet of it in the Briarcliff area next to the schools.

a) The PSCNY (The Public Service Commission Of New York) , in the FEIS 10/01 (6.0 pgs. 6-12 to 6-13) made prominent arguments regarding the danger from fault currents, lightning and other technical reasons. It argued that the pipeline should not be placed under the High Voltage ConEd Power lines (This was the original Millennium route that had been rejected) for fear of pipeline explosion from those risks.

To further underscore this danger, the record to FERC reveals that Senator Schumer sent a letter to FERC on 12/15/01 asking for the movement of the pipeline route to the Northbound side of the Taconic in the area of Todd Elementary School , which would be 500 feet from the ConEd power lines. The Village of Briarcliff, more recently asked for the pipeline to be moved to within 100 to 200 feet of the ConEd power lines in this area. FERC tacitly denied both these alternative routes when it stated in the final certification that this (these) alternative route(s) would place the pipeline closer to the ConEd power lines and the PSCNY has expressed concern about electric reliability if such a change were approved. Translation: decreasing reliability means increased chance of explosion and destruction of the ConEd Electric Power corridor.

These positions were taken by FERC and the PSC despite the increased safety standards given to the pipeline as stated in the Memoranda and Supplemental Memoranda of Understanding (MOU/SMOU) between the PSC and Millennium Pipeline Company that increase pipeline thickness and smart pig frequency of examinations.

These responses from FERC/PSC underscore the increased risk of pipeline explosion to any location next to the Con Ed Electric Corridor and especially at the crossing point of the Pipeline and the ConEd Electric corridor. The only place in Northern Westchester where this crossing occurs is next to the Briarcliff Middle and High School at a distance of 600 feet away , a non survival distance. Remembering that the PSC tried to keep this pipeline 1500 feet away from the electric corridor, to then allow a pipeline and high voltage electric line crossing point anywhere within 1500 feet of a school or other large congregation of people would seem to defy logic and abrogate the responsibility to safeguard the public that FERC and the Public Service Commission has.

b) Consider Cathodic Protection

FERC received a communication in May 2002 from William Gute of the USDOT. He alerted FERC to the findings of significant accelerated corrosion on the newly replaced in service Maritimes and Northeastern Pipeline, and to its implications for the Millennium Pipeline project in the heavily populated eastern portion of this pipeline route. This information indicated locations of worrisome focal corrosion thinning, from 20% to 50%

loss in pipeline thickness, which occurred in only the 3 years the pipeline has been in the ground. The causes were not clearly understood but thought to be related to impressed or stray currents from sources external to the pipeline.

The finding of 36 examples of a loss of thickness 20% or greater implies that there are many many times more locations of less than 20% loss from corrosion, also an uncomfortable thought in a new pipeline. In fact, any loss of thickness implies a loss of the protective epoxy coating in that area making that a likely site for future accelerated corrosion.

The ConEd electric corridor is an area of unusually robust induced electrical currents as it is carrying 2000 megawatts of electricity, and the interaction with the Millennium pipeline can not be ignored. Therefore, it is important that until all these discrepancies are well understood, placing this pipeline alongside the Con Ed EHV amounts to an experimental unknown. Doing so likely increases the risk of accelerated corrosion leading to explosion that would jeopardizes 40% electric supply to the NYC Coastal Zone, the Taconic parkway evacuation Route and the 1900 Briarcliff school children and others near a potential explosion site.

The argument is the same for large number of people in homes in the northern part of the route in Westchester that also parallel the EHV lines

3) Consider The Briarcliff Schools juxtaposed with the Millennium Pipeline and Terrorism

It is acknowledged that our region and country are full of potential sites for terrorism. This pipeline is not yet built and consideration should be given to protecting sensitive sites pro-actively.

Natural Gas Pipelines have been placed under alert by the FBI as of November 26, 2001. Since 9-11, however, we have realized that the terrorists are not just looking to interrupt our energy resources by attacking pipelines or nuclear reactors, but most importantly, are looking to cause large numbers of fatalities by using the energy release from these high energy sources.

So it is not surprising that The Washington Times just printed on October 4, 2002 that US intelligence agencies have reports indicating Islamic terrorists have targeted American schools for attack.

It is the convergence of the Briarcliff schools with the Millennium pipeline and electric supply to New York City, and its proximity to an Indian Point evacuation route, that makes it a special target.

How could this be accomplished?

It is The convergence of the pipeline and Con Edison Electric corridor and highway that marks the spot. Every pilot has an aviation map which shows the Con Edison high voltage crossing point with the Taconic parkway as a landmark. Normally, small aircraft have little ability to threaten the security of large numbers of people, but a direct attack on a pipeline that is only 3 feet in the ground is another matter.

But one need not be high tech!

It is the convergence of the pipeline with the highway that gives terrorists the opportunity. What about a car on the shoulder of the Taconic parkway packed with explosives since terrorists are provided access to the parkway and thus to the pipeline. The pipeline route is clearly marked on the ground because of the One Call System. The One Call System, was conceived of as a way to decrease the greater than 30% cause of accidental pipeline ruptures by third party intervention. While eliminating the easy access of information about our natural gas pipelines is an important tool in fighting a potential terrorist threat, this concept works completely against the one call system policy of fully identifying pipelines with markers/signs and notifying all contractors who contemplate any work near our nation's pipelines.

The paradox is we either have more pipeline accidents from inadvertent 3rd party intervention, if we remove this information, or increased risk from terrorism, if we don't; we lose both ways. The Public Service Commission has indicated that the One Call procedures will remain in effect.

Summary

We have an obligation to safeguard our children by keeping these energy sources far enough away from our schools to protect our most important resource, our children, from calamity from whatever cause. The same can be said for the High Voltage right of way or evacuation routes.

Isn't it amazing that the planners of this pipeline would place the pipeline next to all these critical structures. Al Qaeda must be smiling. Briarcliff however is crying.

The audacity of this pipeline company, showing little regard for the Coastal Zone Management plan and the safety of our schools, drinking water and electric transmission facilities and evacuation facilities illustrates the need to uphold The Dept. Of State inconsistency determination.

Gov George Pataki called me a few months ago regarding the Millennium Pipeline. He said, "sometimes government does not get it right."
He got it right!

Secretary Evans Its your turn. Get it right! Get it right

David Kahn, M.D.

enclosure: Pictures of Todd School, Briarcliff Middle and High School, VFR NY sectional map