

FILE

16-253-CA-BTX

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COMMENT DESCRIPTION:

We are strongly opposed to Duke's Central Corridor Pipeline Project. We have attended two Duke "informational" meetings but they have been more marketing than informational... they evidently meet the requirement for public visibility on the project, but they fail, fail to provide the general public with vital information on the project's benefit and risk. At best they better provide the locations of the proposed pipeline, because otherwise the published maps are not detailed, but they woefully fail to provide information on the pipeline benefit, the risk and the criteria for route selection to the communities. The economics and timeline of this project is

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misjudged because it does not take into account the resistance of the communities to its construction. People and their political representatives will tie this proposal up in the courts for years and the cost for the right-of-ways will skyrocket due to this resistance. In the end, Duke would be better served economically to collaborate with the communities rather than attempt to steamroll them. **BENEFIT:** To accept the risk of the pipeline, there should be a benefit... not just a benefit to Duke, but a real benefit to the community the pipeline physically impacts. Duke has failed to articulate the benefit to the community. Natural gas is fungible, so the Board needs to insist on proof that the pipeline is needed to significantly increase reliability and or that an increase in volume is necessary for the citizens of Hamilton county. The Board needs to insist on proof that the pipeline does not primarily benefit Duke, which is NOT AN OHIO COMPANY, at the expense (risk) of the citizens of Hamilton county, OHIO. **RISK:** Duke had a table labeled "Safety" at their Blue Ash meeting, but the individuals at the table were incapable of articulating the risk associated with a 30" gas pipeline. They were absurdly focused on the risk of people digging near pipelines without first identifying the a pipelines location. While a general risk for utilities, that is not the risk the citizens are concerned about. Citizens are concerned about rupture and the subsequent explosion and fireballs that can incinerate everything within at least 1000 feet of the pipeline. The risk of a traditional pipeline this size is based on rural routes. In fact, the 3 routes Duke has proposed are through highly developed urban communities with a high population density. There is enough experience out there on the pipeline reliability and consequence of failure that an independent study of risk should be published. An accident is inevitable and the consequences in a high density location could be horrific. Duke is basing the safety of the pipeline on compliance with the latest pipeline construction requirements, but everyone knows these requirements evolve as mishaps happen. The problem is that a mishap, if it happens on this 30 inch pipeline, high density route will be catastrophic to the lives of the properties adjacent to the pipeline. Duke officials acknowledged at the meeting that they would not build the pipeline underneath Blue Ash Elementary school, but they grew silent when asked if 200 feet is sufficient margin (Duke's proposal on one of the proposed routes). It is insufficient to only build to the latest pipeline technical requirements and not have a minimum distance between the pipeline and high human density properties such as elementary schools, churches etc. My position is that the economics of this project totally change if a minimum clearance to the pipeline that would be prudent such as 1000 feet (certainly not 200 feet) is required. Duke must no be able to ignore the true risk of this pipeline by hiding behind current technical requirements that are in the process of changing based on recent horrific pipeline ruptures. The citizens deserve visibility to an independent analysis of the risk of this pipeline since it is proposed to pass closely to schools and churches etc. that people go to for safety and peace. It is an unacceptable risk to create the potential for incinerating citizens in their schools and churches when alternative routes exist. Any analysis of the risk/impact of this project should assume there will be an accident, because history says that is a real possibility. **ROUTE CRITERIA:** Duke set up a table labeled Routing at the Blue Ash meeting, but the individual at the table was unable to summarize the criteria for routing. The Project Manager was also incapable of articulating the route selection criteria. Duke selected and then only involved the public after 3 routes through heavily populated areas were selected. Why was the public and local governments not involved in a route criteria BEFORE 3 routes were selected. It seems the answer is, that Duke wanted to only present to the public 3 routes that were to THEIR benefit, and based on the collective input from the public and local governments are NOT to the the public and local governments benefit. No doubt the only criteria for Duke is cost. Duke should be forced to be transparent on ALL the routes they evaluated. The board needs to evaluate ALL the routes Duke evaluated to get to their 3 high population routes. If routes through more industrial, lower population density areas where

easements exist and risk has been accepted exist, and no doubt they do, they should be evaluated against Duke's proposed high population density routes. It stands to reason that it is not acceptable to put a 30 inch gas pipeline within 200 feet of an elementary school (just one obvious example of their flawed evaluation). Duke should not be allowed to be the sole route selector on this controversial project. ECONOMICS: The economics evidently work for Duke because they believe eminent domain will force the citizens of Hamilton county to buckle under to their demands. In fact, at Duke's informational meeting in Sycamore Township, the Project Manager stated to me that the "Ohio Power Sitting Board would approve whatever route Duke proposed"... How arrogant! How unconcerned with TRUE citizen input. My position is that if Duke wants a pipeline, then they need to include the citizens and their government representatives in route selection and benefit/risk evaluation. Otherwise, the citizens will tie this up in the court system and they will resist, by whatever means necessary, appropriation of their property rights lot-by-lot. The economics of the project will turn negative quickly based on the universal opposition to this project. Please do not accept Duke's proposal. Send them back and demand they include citizen's and their representatives before they down select to the 3 unacceptable high population density and potentially deadly routes. Demand they make the case to the public this project is required. They have not done this to date because they have assumed that the Ohio Power Sitting Board will "rubber stamp" their recommendations even against the wishes of thousands of citizens. Dan & Paula Harmon