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The Ohio Power Siting Board
180 East Broad Street
Columbus, Ohio 43215

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OPSB:

On September 10, 2010, as families in the Crestmoor neighborhood of San Bruno, California, sat down to dinner, a blast so strong it hurled a 3,000-lb. section of steel pipe a hundred feet through the air changed life in the San Francisco suburb forever. The fireball that erupted a thousand feet into the sky that evening burned several people alive, leaving eight dead and 51 injured. Thirty-eight homes were destroyed, 70 others heavily damaged. First responders and the media believed at first that a large jetliner had crashed. Fire fighters were held at bay for an hour by the intense heat. It took them nearly an hour to discover that a high-pressure natural gas transmission line had exploded.

After dashing from their homes in the chaos that followed, first to see what had happened, then to run for their lives, residents returning when all the fires had finally been put out found almost three city blocks of houseless chimneys towering over a sea of ash.

A recent *Wall Street Journal* review found that there were 1,400 pipeline spills and accidents in the U.S. from 2010 to 2013 alone. Four in every five pipeline accidents were discovered by local residents, not the companies owning the lines. **From 1994 through 2013, the U.S. had 855 serious incidents involving natural gas transmission and distribution, causing 319 fatalities and 1254 injuries, with more than half a billion dollars in property damage.** None, thankfully, has been as serious as the San Bruno disaster. That's a catastrophe waiting to happen.

Pacific Gas and Electric, the utility company that owned the gas line, was indicted on 27 federal criminal counts for repeatedly violating the federal Pipeline Safety Act; fined \$1.6 billion by the California Public Utilities Commission, the largest penalty ever levied against a California utility; and inundated with hundreds of lawsuits filed by blast victims who suffered injuries and lost family members or homes.

Yet despite this litany of criminal and ethical wrongdoing, one thing PG&E cannot be blamed for is laying this extremely dangerous, ultimately lethal pipeline through an existing residential community. The line was laid before most homes in the area were built, and most residents didn't even know it was there. That colossal error in judgment, lack of concern for public safety, or flagrant act of corporate greed is the brainchild of another public utility, Duke Energy, the \$120 billion company headquartered in Charlotte, NC. The company operates 250 miles of high pressure natural gas pipelines in Ohio and Kentucky, and wants to add a new line right through the center of Hamilton County.

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On Friday April 13th 2018 – a particularly inauspicious Friday the 13th – Duke submitted supplemental documents (**case number 16-253-GA-BTX**) to the Ohio Power Siting Board to their original application in 2016 for a high-pressure 20-inch natural gas pipeline in greater Cincinnati through 19 communities and Cincinnati neighborhoods, with a combined population of over 700,000 people.

As you know, Duke was requesting the OPSB to resume approval proceedings that have dragged out at least partly due to discovery of a Super Fund site near one of the two proposed routes. (The original application was for a 30-inch transmission line; it was reduced in size after an initial public outcry that Duke may or may not have anticipated. Some local residents believe the “concession” was planned from the beginning.)

The suburban neighborhoods affected by Duke’s two proposed routes (reduced from three initially) include:

- More than 40 public and private schools plus the University of Cincinnati, Blue Ash
- 8 hospitals and 5 nursing homes
- More than 40 churches and synagogues
- The premier shopping mall in greater Cincinnati
- As well as many businesses, with well over 100,000 employees, including GE Aviation and a Ford Motor Co. transmission plant.

If the proposal is approved as it stands, it would be the largest pipeline project ever approved at the state level, according to Matt Butler, public outreach manager for the Siting Board. Laying a high-pressure gas pipeline through existing communities like this *has never been done before*.

You’re aware that this is not just another gas main or service line distributing gas to homes and businesses. What Duke calls the Central Corridor Extension is a high-pressure 500 psi pipeline 20 inches in diameter – similar to the 30-inch line that destroyed nearly three city blocks in San Bruno. In other words, it’s a *transmission* line, part of a nationwide high-pressure, high-capacity system for transporting natural gas thousands of miles across the country from processing facilities to local distribution networks. Extremely high pressure must be used to keep the gas flowing.

Although local and county governments have no authority in the matter, Duke’s proposal has been formally opposed by the city councils of Cincinnati and many of the communities involved; by Hamilton County commissioners; by State Representative Jonathan Dever; and by residents, business owners and school boards and administrations all along the route. Duke will seek property easements requiring land to be completely cleared of all trees and landscaping for up to 100 feet, with pipe laid three to four feet underground.

Duke's claim that the routes it has proposed to the Siting Board are the best among 200 originally considered is very hard to believe. And if it *is* true, what in the world were their criteria? Public safety and human lives couldn't have been their primary consideration. In fact, as you know, as absurd as it sounds to ordinary intelligent citizens, safety to human lives is *not* one of the criteria the OTSB has to consider.

Another Duke claim that strains credulity is that the pipeline is "being designed in order to increase the reliability and dependability of the natural gas delivery system in the area." But a 20-inch diameter pipeline supplying natural gas at 400 psi is enough for two million homes, while Duke has only 500,000 customer accounts in Ohio and Kentucky combined. Those opposed to the pipeline are skeptical of Duke's less than transparent long-range plans. Some think it will ultimately be part of some non-local network such as an interstate transmission system to transport gas from northeast Ohio fracking operations all the way to the Gulf Coast.

Duke's proposed 12-mile line is an extension of a pipeline constructed in 2003 to provide gas transmission from cross country pipelines to northern Hamilton County. As planned, it would connect with an existing regulator station just north of the county and run through 19 heavily populated northern suburbs of Cincinnati to an existing pipeline at the south end of the line.

Arguments against the pipeline have ranged from the obvious public safety problems if there were an explosion, to the loss of property values and damage to the environment and the local economy. For example, Reading, one of the communities affected, expressed concern about losing a major development grant because of the hazard the pipeline would entail. Hamilton County Commissioner Todd Portune, one of many government officials against the pipeline, is pushing for Duke to inform any property owner within 2,000 feet, almost half a mile, from the pipeline. This is roughly the "blast zone" for a pipe of this size, outlined by a nonprofit organization known as the Pipeline Association for Public Awareness.

The blast zone is also termed an "incineration zone." When a 30-inch pipeline exploded in rural Salem, PA, in April of this year it sparked a fire that left a man whose home was 500 yards from the explosion, critically burned over much of his body – not from flames but from radiant heat alone. **"The heat was so intense it was burning him as he was running away," said Bob Rosatti, chief of the Forbes Road Fire Department. "I parked a quarter mile away and I couldn't get out of my truck because it was that hot."** This was a house five football fields from the blast. Try to imagine the catastrophe that will ensue when (*not* "if") a similar explosion occurs in one of the densely populated residential neighborhoods Duke is seeking your permission to invade with their *unnecessary* pipeline. **Will it be children, hospital patients, or the elderly in nursing homes trapped in an inferno that firefighters can't rescue them from?**

"This is not a 'not in my backyard' issue," declares Elizabeth Rueve-Miller, one of the founders of NOPE, a local grassroots organization, Neighborhoods Opposing Pipeline Extension. "This is a 'not in *anyone's* backyard' issue." The local Sierra Club agrees. At an informal open house held by Duke in June 2016, club members passed out a flyer likening the pipeline to "a continuous oil train moving huge quantities with potentially catastrophic consequences." Duke has already been cited by OSHA for not following workplace safety regulations and fined for a gas explosion in Lebanon, OH. North Carolina has fined Duke on multiple occasions for spilling waste into waterways.

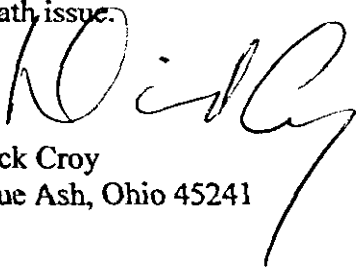
But "this is not about demonizing Duke," said Councilman P.G. Sittenfeld, who authored the resolution of opposition signed by the Cincinnati City Council to fight Duke's current options in any way possible. "We appreciate them as a major employer and business in our community. But we have a higher expectation of them that has not yet been met." The community, he said, has let Duke "know that they are trying to fit a square peg into a round hole – or rather, trying to force a massive and potentially dangerous pipeline onto densely populated residential neighborhoods."

Blue Ash resident Glenn Rosen, a founder of NOPE, said, "It's too big. It's got way too much pressure. It's intended to *transmit* gas, not distribute gas to anybody nearby here." He began organizing his neighbors in February 2016 to fight Duke's proposal. "This belongs in a rural area where there are not a lot of people."

Another Blue Ash resident, agreed. "What I'm saying is, circumvent. Why go through Hamilton County? Why go through the city center when we can go around? Go into rural counties where we won't have to train a massive amount of first responders. Accidents happen, 20-30 years from now. These pipelines have life expectancies."

Yes, it could possibly be that long before history repeats itself in a San Bruno-like holocaust in northern Cincinnati. If so you would no longer be serving on the OPSB. But do you really wish to gamble on making this extraordinary miscarriage of justice, human decency and common sense your legacy?

Thank you for reading this letter and my plea for your heartfelt consideration of this life and death issue.



Dick Croy
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