

14 October, 2015

The Honorable Andrew M. Cuomo  
Governor of New York State  
NYS State Capitol Building  
Albany, NY 12224

Health Commissioner Howard A. Zucker  
New York State Department of Health  
Corning Tower  
Empire State Plaza,  
Albany, NY 12237

Cc: Acting DEC Commissioner Mark Gerstman  
Incoming DEC Commissioner Basil Seggos

Dear Governor Cuomo and Health Commissioner Zucker,

We, the undersigned health experts and scientists representing Physicians for Social Responsibility nationally and in New York, and Concerned Health Professionals of New York, write to share the third edition of our major compilation and analysis of scientific and health findings related to the impacts of unconventional oil and gas development, particularly high volume hydraulic fracturing (HVHF or “fracking”). In considering the scientific evidence leading up to and following New York’s ban on HVHF, we applaud you for your leadership in relying on solid scientific and medical research and protecting the public health and safety of New Yorkers.

While New York has protected public health and safety from the hazards of HVHF, there is an influx of numerous proposals to expand gas infrastructure. On this topic, for the first time, this edition of our report also compiles and concisely summarizes the evidence pertaining to the impacts of natural gas infrastructure, including transmission pipelines and compressor stations. Considering this new information, we urge New York to use its power in the permitting process to put on hold and deny permits to expand gas infrastructure while assessments of public health and environmental impacts can be undertaken.

We bring your attention primarily to two of our conclusions. First, the new report, *Compendium of Scientific, Medical, and Media Findings Demonstrating Risks and Harms of Fracking, Third Edition*, shows that New York State was right in concluding that “[e]ven with the implementation of an extensive suite of mitigation measures considered...the significant adverse public health and environmental impacts from allowing high-volume hydraulic fracturing to proceed under any scenario cannot be adequately avoided...” (NYS DEC Findings Statement, p. 5). More than 100 new peer-reviewed studies on the impacts of drilling and fracking have been published since New York’s high volume fracking ban was announced in December 2014. Overwhelmingly, these studies find significant risks and adverse impacts, as do the more than 400 studies that we had reviewed in the previous edition of the Compendium. These research results are compelling, and we are therefore urging the governors of other states to follow your lead.

Second, the evidence compiled in our report makes clear that New Yorkers are at risk from gas infrastructure projects. As with hydrofracking, the evidence available to date confirms that New York’s DOH and DEC were right to note the potential for harmful air impacts, environmental impacts, and other risks from infrastructure. (DOH Health Review p. 5 and Findings Statement p. 27) Compressor stations

and pipelines are both major sources of air pollutants, including benzene and formaldehyde, that create serious health risks for those living nearby while offering little or no offsetting economic benefits. Compressor stations – used along regular intervals of most pipelines – in particular, are semi-permanent facilities that pollute the air 24 hours a day and expose nearby residents to levels of noise pollution known to induce negative health effects. Moreover, emerging data show that their day-to-day air emissions are highly episodic and create periods of potentially extreme exposures.

We have particular concerns about the air pollution events created by compressor station “blowdown” events, which are used for maintenance and to control pressure and can last for hours. The intentional or accidental releases of gas through valves create 30- to 60-meter-high gas plumes, causing high levels of contaminant release. Anecdotal accounts associate blowdowns with short term effects such as nosebleeds, burning eyes and throat, skin irritation, and headache. Given the chemicals released, we are deeply concerned about the possible long-term effects of these exposures, including cancer, asthma, heart disease and severe neurological impairments. We note that there exists neither a national nor a state inventory of compressor station accidents. We have yet to accumulate an extensive body of peer-reviewed research on the public health impacts of compressor stations, but our new report includes very troubling documentation of extensive leakage of methane and other contaminants.

Further, while air pollution from natural gas compressor stations and pipelines threatens the health of New Yorkers directly, methane leaks and losses also contribute significantly to the exacerbation of climate change. Emerging research from Texas and Pennsylvania shows that methane emission rates from compressor stations can significantly exceed those from well pads themselves.

Additionally, as New York rightly concluded (Findings Statement, p. 18), natural gas infrastructure contributes to climate change not only directly but also by furthering availability and consumption of fossil fuel, which “has the potential to undermine the deployment of various types of renewable energy and energy efficiencies, thereby suppressing investment in and use of these clean energy technologies.” As rightly noted in the Findings Statement, this is counterproductive to the state's goal to reduce greenhouse gas emissions 80 percent by 2050.

In short, what we already know about the public health and climate risks of fracking infrastructure is troubling. What we don't know is all the more alarming. As New York is faced with numerous proposed new and additional gas pipelines, compressor stations, storage facilities, and a major liquefied natural gas terminal, we believe it is crucial to examine both the individual risks these projects pose and to consider their cumulative impacts, including to the state's climate and energy goals. Unfortunately, in many cases the federal government has approved permits without adequate consideration of critical issues and impacts. Such is the case with the approval of Spectra Energy's ‘Algonquin Incremental Market’ pipeline that has been approved by FERC to be constructed within 105 feet of the Indian Point nuclear power plant.

This year the Medical Society of the State of New York and the American Medical Association have each specifically called for comprehensive health impact assessments regarding the health risks associated with fracking infrastructure, including natural gas pipelines and compressor stations. We reiterate that call and ask for the assessment to include cumulative impacts to public health and the state's climate and energy goals. Moreover, we strongly urge New York State to put on hold and deny any expansion of natural gas transmission and storage projects, until and unless their safety can be demonstrated through comprehensive public health and environmental assessments.

Sincerely,

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