**ISSUE: DEIS IGNORES REQUESTED ANALYSIS OF IMPACTS OF TEMPERATURE AND VELOCITY OF EMISSIONS FROM TWO 50-FOOT SMOKESTACKS FOR PROPOSED COMPRESSOR STATION 206**

Copy to NJDEP: [Ruth.Foster@dep.nj.gov](mailto:Ruth.Foster@dep.nj.gov) and [Megan.Brunatti@dep.nj.gov](mailto:Megan.Brunatti@dep.nj.gov)

Dear FERC Leadership:

I am an intervenor in the Northeast Supply Enhancement Project (CP17-101), and I read that your staff wrote that “All comments are addressed in this EIS …” (DEIS, page 3-8). Though many were dismissed with rationales that I will not address here, one stood out as problematic to me (DEIS, page 4-81): “We received numerous comments expressing concern that Compressor Station 206 would impact trees and birds due to the velocity and temperature of air emissions from the natural gas-fired turbine compressor exhaust stacks.”

FERC’s response on page 4-81 of the DEIS was: “The two 50-foot-high exhaust stacks would be located next to each other within the developed area of the compressor station facility, about 250 feet from the post-construction tree line. While there is no available data on high velocity, high temperature exhaust impacts on birds, we do acknowledge that it is possible for birds to enter into the exhaust stream. Due to the industrial nature of the compressor station (increased noise, human activity, and light during nighttime hours) and distance between the exhaust stack and nearest tree line, we conclude that the potential for exhaust from the compressor station to significantly impact birds is low. Impacts and conservation measures associated with raptors and other migratory birds are discussed in more detail in section 4.5.1.2.”

FERC staff did not list sources consulted for information pertaining to this potential danger or their analysis of any information that is available.

FERC did not provide any data to support its conclusion that the industrial nature of the compressor station and distance between the stacks and the nearest tree line are reasonable bases for implying that the impact to birds from the heat and velocity of the exhaust would be significantly low.

To provide a basis for meaningful public comment in FERC’s decision-making process, this needs further exploration. A quick search of the internet revealed that there are problems in the Meadowlands in NJ where methane is burned off, and hot temperatures burn the birds flying over the stack (accessed from <https://www.nytimes.com/2017/04/26/nyregion/invisible-bird-killer-lurks-in-revitalized-new-jersey-meadowlands.html>). I’m sure that there has been some study of the impacts and needed mitigation for the emissions from tall smokestacks that emit with high velocity and high temperature. The proposed Compressor Station 206 cannot be the first natural gas-fired compressor station with tall smokestacks.

In conclusion, I am requesting that FERC require an environmental assessment of the potential impact of the expected ongoing heat and velocity from the two 50’ smokestacks on the environment – birds, vegetation, and wildlife habitats in the area. Once that assessment is complete, it should be available to the public on the FERC docket, and FERC should extend the short 45-day comment period to allow time for review and commenting.