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

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Dear FERC Leadership:

I am an intervenor in the Northeast Supply Enhancement Project (CP17-101), and I am writing because FERC staff failed to address concerns posted to this docket about the emissions anticipated to come from the two (2) smokestacks at the proposed Compressor Station 206 site. Submissions are missing studies regarding the environmental impact of the anticipated velocity and temperature of emissions - 210,000 cubic feet per minute (cfm) at 849 degrees Fahrenheit - on birds, bats, insects, and nearby vegetation and weather patterns. With the Solar Mars 100 specification sheet in the application indicating a higher temperature than 849 degrees Fahrenheit, it is critical to assess this high volume heat exhaust effect on the local environment. This heat will be at a constant volume day and night, which needs to be full assessed in terms of the impact to the environment.

By responding with the following, FERC staff indicated that they did not adequately address this concern and, actually, dismissed it without any investigation. FERC staff noted: “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.” (DEIS, page 4-81)

The “conservation measures” in sections 4.4.1.1 and 4.5.1.2 of the DEIS do not adequately address the threat from the velocity and temperature of this exhaust. For example, FERC staff wrote the following in their DEIS: 4.5.1.2 Raptors and Other Migratory Birds – “On March 30, 2011, the FWS and the FERC entered into a Memorandum of Understanding (MOU) that focuses on avoiding or minimizing adverse impacts on migratory birds and strengthening migratory bird conservation through enhanced collaboration between the two agencies. This voluntary MOU does not waive legal requirements under the MBTA, BGEPA, ESA, Federal Power Act, NGA, or any other statutes and does not authorize the take of migratory birds.” (page 4-81), and “To avoid or reduce construction-related impacts on migratory birds, Transco consulted with the applicable FWS offices and the NJDEP to identify mitigation measures, including identifying the times of year when construction should be avoided. The agency-recommended migratory bird buffers and time of year restrictions are described in table 4.5.1-2. These measures as well as others described below are included as part of Transco’s Draft Migratory Bird Plan.” (page 4-84)

NOTES:

This MOU is not published on the FERC docket for the NESE Project, so there is no way for the public to know if the issue of exhaust velocity & temperature was addressed.

From a review of the Draft Migratory Bird Plan, these issues about dangers from temperature and velocity of the exhaust from the two smokestacks were not considered at all. Reviewed: SUPPLEMENTAL INFORMATION FILING 3 - ATTACHMENT 10 - DRAFT MIGRATORY BIRD PLAN, in Accession No. 20170907-5176(32387000).

In conclusion, FERC did not provide any data or studies to support its assertion that the industrial nature of the compressor station and distance between the stacks and the nearest tree line are reasonable bases for not considering these potential impacts.

To provide a basis for meaningful public comment in FERC’s decision-making process, this needs further exploration and a supplemental report from FERC with an extension of the 45-day “comment period”. Thus, I request that FERC complete an Environmental Impact Assessment of the impact of the expected velocity and temperature of emissions from the two smokestacks that are proposed to be on the Compressor Station 206 site, publish this assessment, and then extend the “comment period” to allow for public engagement that is meaningful.