



SIERRA CLUB

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Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426
via FERC eFiling

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On behalf of the 40,000 members and supporters of Sierra Club in Connecticut, thank you for the opportunity to provide comments regarding the draft Environmental Impact Statement (EIS) in Docket Number CP20-48-000.

The Sierra Club is committed to solving the climate crisis with just and equitable solutions that will result in a healthy world for everyone. The science is clear, we need to be undertaking an all-out effort to decarbonize our economy to avoid the worst future impacts of the climate crisis. We are concerned that the EIS fails to provide a robust analysis of the climate, air and the upstream environmental impact of the proposed Expansion by Compression project. However, even with the limits of the analysis, the project should be rejected as it will threaten the environment by contributing to climate change.

Climate change: The draft EIS states very clearly that the proposed Expansion by Compression project will “*increase the atmospheric concentration of GHGs, in combination with past and future emissions from all other sources and would contribute to climate change.*” The consequences of climate change on the environment in Connecticut are a serious threat to the health and well-being of the families in our state. They include heat waves, storms, droughts, and rising sea levels that are and will continue to impact ecosystems.¹ The analysis of the impact on the environment in Connecticut due to climate change is not nearly adequate, however; the conclusion that this project will contribute to climate change should guide FERC to reject this proposal.

Air quality: The EIS states that “analysis in the EA was based on the results of Iroquois’ air modeling” and the company’s “proposed emissions controls to reduce emissions.” Given the multiple recent system failures at the compressor station in Weymouth, Massachusetts, this is deeply concerning. Toxic air emissions, like those experienced in Weymouth, will degrade air quality in Connecticut and expose residents to volatile organic compounds including toxic chemicals known to cause cancer, damage to the liver and central nervous system, and more. It is also concerning because Connecticut already has some of the worst air quality in the nation, and high rates of asthma disproportionately borne by environmental justice communities. Asthma Capitals 2019, ranked New Haven (#11) and Hartford (#13) among the 100 largest U.S. cities where it is most challenging to live with asthma. Emissions will be increased by this unneeded project; emission controls are not a substitute for preventing the increased emissions altogether.

¹ https://nca2018.globalchange.gov/downloads/NCA4_Ch18_Northeast_Full.pdf

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Upstream impacts: In Connecticut, we are especially concerned with the impacts this pipeline expansion will have here in our state; we urge greater emphasis on the analysis of upstream impacts. We cannot ignore the upstream impacts of fracking on the environment, climate and people of Pennsylvania. The project will further the enduring environmental injustice by continuing to frack the water, air and rural landscapes of the Keystone State.

While we believe a more robust analysis of climate, air, and upstream impacts of this project is needed, we also believe that the EIS conclusion that this project will contribute to climate change, an emergency that threatens every aspect of our lives, should guide FERC to reject this proposal.

Thank you for your consideration of our comments.

Sincerely,

Samantha Dynowski, State Director
Sierra Club Connecticut