

October 27, 2022

Secretary Jennifer Granholm
U.S. Department of Energy
1000 Independence Ave SW
Washington, DC, 20585
The.Secretary@hq.doe.gov

Dear Secretary Granholm,

We write in support of the letter filed by The Sierra Club, Friends of the Earth, Earthworks, Environment America, Delaware Riverkeeper, and the Center for Biological Diversity asking the Department of Energy (DOE) to respond to the [2013 rulemaking petition](#) from those same groups calling for a rulemaking on gas export policy. This petition asked DOE to revise the now nearly 40-year-old policy for approving liquefied methane gas (LNG) exports, which were based on *import* guidelines. The petition called on DOE to provide a “full public notice and comment process to update its decision-making guidelines,” and ensure that this process be “fully informed by the economic and environmental and public health studies which the Natural Gas Act and the National Environmental Policy Act (NEPA) require.”

As residents from and advocates for the Gulf Coast of Texas and Louisiana, the epicenter of the LNG export industry, we feel strongly that DOE open a transparent rulemaking and inclusive comment process on the public interest determination for gas exports. While DOE rubber-stamps LNG export applications, communities across the Gulf Coast and elsewhere suffer from the public health, economic, and climate impacts of this industry.

Gulf communities – particularly Black, Brown and Indigenous communities – where DOE continues to approve applications for LNG export expansion already suffer from elevated rates of respiratory and cardiovascular disease, premature death, and cancer. Freeport, Port Arthur, Corpus Christi, Cameron Parish, Calcasieu Parish and Plaquemines Parish, and the Texas Rio Grande Valley all have documented studies demonstrating negative health outcomes due to industrial pollution. **Every public interest determination is also an environmental justice determination, and DOE rules should clearly reflect this.**

In many cases, allowing additional LNG exports is actively *against* the public interest, especially when considering impacts on environmental justice communities. However, current DOE rules do not account for cumulative public health impacts from existing pollution sources, including those from existing LNG export facilities, oil export facilities, petrochemical facilities, and others, in any meaningful way. Furthermore, DOE fails to adequately consider public health impacts from associated activities, for instance: gas pretreatment pollutants, fugitive emissions from pipelines, and additional ship traffic. Finally, DOE must consider community risk from leaks and explosions, as exemplified by the earthshaking explosion at Freeport LNG in June 2022 or the \$2.2 million PHMSA fine levied in 2021 for dangerous methane leaks at Cheniere’s Sabine Pass LNG. Liquefying and transporting compressed gas is an inherently risky process, and we expect

to see further explosions and leaks, particularly given that the Gulf South is ground zero for hurricanes and other climate-induced disasters.

Consumers, including those of us in energy-producing regions, are also suffering from inflation exacerbated by LNG exports. Recently, skyrocketing home energy prices can be traced to increases in LNG exports, as can increases in prices of consumer goods. Every export application approved by DOE sentences US residents to paying more to heat and cool our homes, which is particularly painful for low- and fixed-income households. The June explosion at Freeport LNG demonstrated exactly how export terminals have a dramatic impact on domestic methane gas prices; domestic gas prices plummeted on news that Freeport would be offline for several months, freeing up more gas for domestic consumption. Gas exports are not just bad for American consumers; they're also destroying American manufacturing. The same gas that is used to heat homes and generate electricity is also used to make fertilizers to grow food, manufacture medical devices and pharmaceuticals, and make many basic consumer goods.

In both Texas and Louisiana, LNG exporters receive massive tax abatements for new facilities and expansions of existing facilities (to meet increased export thresholds approved by DOE). This detrimentally affects our local economies. For instance, a recent [study](#) showed Cheniere Corpus Christi LNG received \$950,000 in tax breaks for every job it created in the region. We see no way that higher home energy costs and lower local tax revenues could be considered in the public interest, yet DOE does not include these consumer and community considerations in its outdated rules, nor the destructive effects of LNG exports on other local industries, like fishing, shrimping, and tourism.

Perhaps the cruelest irony in DOE's currently flawed process is the fact that virtually every LNG terminal is also located in an area prone to climate-induced disasters, which are only exacerbated by increased LNG exports. Permitting full buildout and expansion of proposed LNG infrastructure would be like allowing [578 coal plants or 465 million cars](#) to belch carbon pollution *for the next three decades*. Communities in the Gulf who suffer everything from inconvenience to anxiety to outright devastation from increasingly intense and frequent storms cannot serve as sacrifice zones due to the fossil fuel industry. The climate is changing. Black and Brown and Indigenous people in the Gulf are bearing the brunt of it. DOE cannot ignore this when determining what is in the nation's public interest.

These are generational decisions. DOE rules must reflect the gravity of their impacts on public health, the economy, the climate and the environmental justice communities who live on the frontlines. **The buildout of LNG exports in our region is a glaring environmental injustice, and DOE's outdated public interest determination conflicts with the Biden Administration's environmental justice goals. We ask you – as soon as possible – to begin to remedy this injustice by allowing communities impacted by LNG buildout as well as all other stakeholders to provide input into a modernized and fairer public interest determination.**

Sincerely,

Texas Campaign for the Environment

Healthy Gulf

Louisiana Bucket Brigade

The Vessel Project

Port Arthur Community Action Network

Citizens for Clean Air and Clean Water of Brazoria County

Earthworks

Property Rights and Pipeline Center

Turtle Island Restoration Network

Big Thicket Biosphere Reserve

Environment Texas

Honor the Earth

Beyond Extreme Energy

Action for the Climate Emergency

John Allaire

Ariana Akbari

cc:

Brad Crabtree, Assistant Secretary, U.S. DOE, Office of Fossil Energy and Carbon Management

David Turk, Deputy Executive Director, U.S. DOE, International Energy Agency

Shalanda Baker, Director, U.S. DOE, Office of Economic Impact and Diversity

Tony Reames, Deputy Director for Energy Justice, U.S. DOE

Richard Glick, Chairman, Federal Energy Regulatory Commission

Michael Regan, Administrator, U.S. Environmental Protection Agency

Pete Buttigieg, Secretary, U.S. Department of Transportation

Tristan Brown, Deputy Administrator, U.S. Department of Transportation, Pipeline and
Hazardous Materials Safety Administration

Brenda Mallory, Chair, Council on Environmental Quality

Debra Haaland, Secretary, U.S. Department of Interior

John Podesta, Senior Advisor to the President for Clean Energy Innovation and
Implementation

Ali Zaidi, Assistant to the President and National Climate Advisor, The White House