

April 8, 2024

The Honorable Jennifer Granholm
Secretary of Energy
U.S. Department of Energy
1000 Independence Ave SW
Washington, DC 20585

CC: President Joseph R. Biden

In the matter of: Department of Energy Updates to LNG Studies

Dear Secretary Granholm:

Thank you for your commitment to protect our climate and communities by pausing the licensing of new Liquefied Natural Gas (LNG) exports. The pause is an important opportunity not just to update the previous economic and environmental reports that the Department of Energy (DOE) relies on for making a Public Interest Determination, but also to incorporate vital considerations previously not analyzed in these studies like environmental justice. DOE has been mandated the authority to deny these permits under the Natural Gas Act, and has the obligation to say “no” when the impacts and harms of these facilities outweigh their benefits to the public. Previously, we have seen DOE update these studies without addressing fundamental flaws or our concerns before finalizing LNG export approvals. **We urge DOE to conduct a robust analysis that fully accounts for all impacts of LNG exports along the entire supply and delivery chain and objectively apply these results to future applications.** We agree with the Biden Administration that until the planned updates to these studies are complete, DOE should not make a final decision on any pending or new non-free trade agreement export application.

Until this point, no DOE Public Interest Determination study has ever considered the environmental justice impacts of LNG exports. **DOE’s updated analyses, as well as review under the National Environmental Policy Act (NEPA), must include a rigorous, cumulative environmental and climate justice analysis that details the harms across the whole supply and delivery chain.** This should include a cumulative risk assessment evaluating the potential for catastrophic events, such as explosions, incorporating the potential for overlapping or chain events at neighboring facilities. This analysis should include the displacement of people out of coastal areas due to sea level rise that is linked to fossil fuel use. Louisiana’s experience includes one indigenous community, Isle de Jean Charles, that has been relocated out of the coastal zone because utility infrastructure and emergency services: roads, power, first responders etc. could not reliably support it through repeated flooding whether due to tropical storms or ordinary (non-storm related) tides. DOE’s review under NEPA must be robust and include a programmatic Environmental Impact Statement (PEIS), which would allow for a comprehensive review for projects that affect numerous jurisdictions. A PEIS is necessary for an aggregate review because the massive LNG buildout and export is affecting many communities across multiple regions.

In addition to examining disparate health and environmental harms, DOE must examine the distributional and energy justice impacts increased energy prices will have on domestic

consumers, manufacturers, and farmers. The corporations and shareholders that profit from LNG exports are not the ones suffering disruptions and higher prices at home, and this must be accounted for in the updated analyses during the pause. As DOE has acknowledged, the Energy Information Administration (EIA)'s 2023 long-term outlook found that as the U.S. exports more LNG, global and domestic prices converge and that “higher LNG exports create a tighter domestic natural gas market (all else held equal), increasing domestic natural gas prices.” And yet, DOE has not adequately considered such cost impacts in its public interest determination process. DOE must also utilize these updated studies to account for the local economic impact LNG exports have on businesses such as tourism and fisheries due to ecosystem degradation and air pollution among other factors.

DOE must use the latest climate science and analysis on the pace of a global just transition to renewable energy as the baseline. The Dubai Consensus reached at COP28 calls for “transitioning away from fossil fuels in energy systems, in a just, orderly and equitable manner, accelerating action in this critical decade, so as to achieve net zero by 2050 in keeping with the science.” **LNG is a major source of greenhouse gas emissions, and the studies that DOE has been relying on to make its Public Interest Determination do not adequately reflect the lifecycle emissions from exports, the social cost of those lifecycle greenhouse gas emissions, nor an accurate comparison of what LNG is competing against.** DOE's outdated studies incorrectly compare the lifecycle greenhouse gas emissions of U.S. LNG to those of other fossil fuels. DOE's analysis should include a robust analysis of the true lifecycle emissions of U.S. LNG, comparison of those emissions against the renewable energy and energy efficiency solutions that US LNG exports are competing against, and an accurate assessment of the end-use of U.S. LNG since the majority of new contracts are being purchased by LNG re-sellers with no clear final contractual or permitted destination. The greenhouse gas emissions must accurately reflect the latest science on methane leak rates at every lifecycle stage. A [March 2024 study](#) published in Nature concluded from one million aerial site measurements that actual methane leaks are three times as high as the official national inventory estimate. This assessment should also include an analysis of the climate impacts on the US and other countries from the increased emissions associated with an LNG expansion and how an expansion fits within the climate constraints of a 1.5 degrees Celsius pathway. It is clear that the U.S. must transition away from fossil fuel dependence as a whole towards renewable solutions “in keeping with the science” of holding global warming to 1.5 degrees Celsius. LNG exports will often undercut the competitiveness of renewables and storage including in Europe and Asia, further undermining global climate commitments. Renewables and storage are already [more economically competitive than LNG](#) in many U.S. export markets – including Germany, Pakistan, and Vietnam – , and the transition to renewable energy will only accelerate exponentially toward 2050—the term of DOE's export authorizations.

Public participation is critical to the review process during this pause and is a necessary component of completing a robust environmental justice analysis. **DOE must actively solicit and ensure meaningful public participation opportunities, including in-person public hearings at locations on the TX and LA Gulf Coast.** “Meaningful” means that people's comments and contributions have consequences and that individuals and communities have the power to influence the outcome of DOE's decision. This public participation process must include the opportunity for impacted community members and environmental justice leaders and

scholars to provide input and guidance of the methods and direction of the studies that will inform the public interest determination, in addition to having a robust public comment and outreach period for any draft completed reports. Comments received in this manner should not only be addressed by DOE fully and publicly, they should also be directly incorporated into revisions of the studies and the final product. In order to center those most impacted by these facilities, we call on DOE to create some form of Advisory Board or Task Force of frontline community members and empower that body to work with DOE to incorporate experiences and knowledge into the public interest determination process, along with any new studies. In addition to ensuring robust community engagement throughout the updated studies, DOE must ensure that each individual public interest determination moving forward provides a public comment period. DOE must ensure that impacted community members have the opportunity to engage in the case-by-case analysis, and DOE needs to quantify and specify the GHG, economic and environmental justice impacts of each project, avoiding reliance on generalized studies.

The Administration's decision to pause the approval of new export licenses is a positive first step, but it is past time for a robust review of LNG export proposals and our frontline communities, domestic consumers, and manufacturers are actively suffering as a result. **We call on DOE to look at the true economic, social, and environmental costs of more LNG exports, objectively apply this analysis to LNG export applications, and be ready to deny any projects that are not in the public interest.**

Sincerely,

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350 Bay Area Action

350 New Orleans

350 Seattle

A Community Voice

Action for the Climate Emergency (ACE)

Alaska Wilderness League

Alliance for Affordable Energy

Bayou City Waterkeeper

Better Brazoria: Clean Air & Water

Beyond Extreme Energy

Bold Alliance

Boundless Community Action

Bullard Center for Environmental and Climate Justice at Texas Southern University

California Environmental Voters

Cameron Parish Landowner

Center for Biological Diversity

Center for Oil and Gas Organizing

Center for Progressive Reform

Chesapeake Climate Action Network

Chester Residents Concerned for Quality Living

Chispa Texas

Clean Energy Now Texas

Climate Conversation Brazoria County
Climate Critical
Climate Law & Policy Project
Climate Reality Project Greater New Orleans Chapter
Coalition Against Death Alley
Common Defense
Concerned Citizens of St. John
Concerned Citizens Table of Lake Charles
Conservation Voters New Mexico
Conservation Voters of PA
Dayenu: A Jewish Call to Climate Action
Delaware Riverkeeper Network
Earth Action, Inc.
Earthjustice
Earthworks
Endangered Species Coalition
Environmental Justice Health Alliance for Chemical Policy Reform
Evergreen Action
FISH (fisherman involved in sustaining our heritage)
Food & Water Watch
For a Better Bayou
Frack Action
FreshWater Accountability Project
Friends of the Earth
Gen-Z for Change
Greater New Orleans Interfaith Climate Coalition
GreenARMY
Greenpeace USA
Group Against Smog & Pollution
Healthy Gulf
Hip Hop Caucus
Illinois Environmental Council
Inclusive Louisiana
Indiana Conservation Voters
Ingleside on the Bay Coastal Watch Association
Institute for Policy Studies Climate Policy Program
Interfaith Power & Light
JPAP
Landowner Cameron Parish
Landowner Cameron Parish Louisiana
League of Conservation Voters
Louisiana Bucket Brigade
Louisiana League of Conscious Voters
Maine Conservation Voters
Maryland LCV
Memphis APRI

Micah Six Eight Mission
Michigan League of Conservation Voters
Natural Resources Defense Council
New Jersey League of Conservation Voters
North American Climate, Conservation and Environment (NACCE)
North Carolina Council of Churches
North Carolina Interfaith Power & Light
North Carolina League of Conservation Voters
Nuclear Information and Resource Service
Ocean Defense Initiative
Oil and Gas Action Network
Oil Change International
Oxfam America
Patagonia
Port Arthur Community Action Network (PACAN)
Progress Texas
Progressive Democrats of America (PDA)
Property Rights and Pipeline Center
Public Citizen
RESTORE
RISE St. James Louisiana
Scenic Galveston, Inc.
Sierra Club
South Coast Neighbors United
SouthWings
Stand.earth
Sunrise New Orleans
Texas Campaign for the Environment
The Revolving Door Project
Third Act
Turtle Island Restoration Network
Union of Concerned Scientists
Vermont Conservation Voters
Vermont Natural Resources Council
Vessel Project of Louisiana
Voices for Progress
Wall of Women
Washington Conservation Action
Waterkeeper Alliance
WE ACT for Environmental Justice
West End Revitalization Association - WERA
Wisconsin Conservation Voters
Zero Hour