



October 27, 2022

The Honorable Secretary Jennifer Granholm  
United States Department of Energy  
1000 Independence Ave, SW  
Washington, DC 20585

Dear Secretary Granholm,

The undersigned organizations are members of the Environmental Justice Leadership Forum, a network of approximately 50 environmental justice advocates and groups in 22 states working together to advance climate justice and impact federal, state, and local policy to ensure the protection and promotion of communities of color and low-income communities throughout the U.S. As a follow-up to our letter in March 2022,<sup>1</sup> we strongly urge you to revisit and update the Department of Energy's (DOE) public interest determination with respect to liquified natural gas (LNG) exports to protect environmental justice communities, stabilize domestic energy prices, and tackle climate change.

In less than a decade since the Congress lifted restrictions, LNG exports have dramatically increased. The US became the world's top LNG exporter during the first half of the year.<sup>2</sup> Yet, this exponential growth and proposed plans to expand LNG production and operations compromises our ability to achieve national and international goals to limit global warming. LNG has an extensive climate footprint as gas contains methane, a highly potent greenhouse gas. Building out new and expanded proposed LNG terminals would be equivalent to 578 coal plants<sup>3</sup> – a step in the wrong direction when science and energy experts are telling us we need to move away from fossil fuels towards clean, renewable energy to achieve net zero emissions by 2050.<sup>4,5</sup>

More importantly, the growth of LNG capacity and exports also comes at a great cost to frontline communities, especially in the Gulf Coast of Texas and Louisiana.<sup>6</sup> For decades, areas of low-wealth, Indigenous, and people of color have been treated as sacrifice zones by the fossil fuel industry. These environmental justice communities are disproportionately affected by toxic

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<sup>1</sup> [https://www.weact.org/wp-content/uploads/2022/03/FINAL\\_LNG-EJ-Sign-on-Letter.pdf](https://www.weact.org/wp-content/uploads/2022/03/FINAL_LNG-EJ-Sign-on-Letter.pdf)

<sup>2</sup> [https://www.eia.gov/todayinenergy/detail.php?id=53159#:~:text=The%20United%20States%20became%20the%20world's%20largest%20liquefied%20natural%20gas,dav%20\(Bcf%2Fd\).](https://www.eia.gov/todayinenergy/detail.php?id=53159#:~:text=The%20United%20States%20became%20the%20world's%20largest%20liquefied%20natural%20gas,dav%20(Bcf%2Fd).)

<sup>3</sup> <https://www.sierraclub.org/articles/2022/08/climate-and-public-health-impacts-lng-exports>

<sup>4</sup> [https://report.ipcc.ch/ar6wg2/pdf/IPCC\\_AR6\\_WGII\\_SummaryForPolicymakers.pdf](https://report.ipcc.ch/ar6wg2/pdf/IPCC_AR6_WGII_SummaryForPolicymakers.pdf)

<sup>5</sup> <https://iea.blob.core.windows.net/assets/4ed140c1-c3f3-4fd9-acae-789a4e14a23c/WorldEnergyOutlook2021.pdf>

<sup>6</sup> <https://cms.ferc.gov/media/north-american-lng-export-terminals-existing-approved-not-yet-built-and-proposed-8>

pollution such as sulfur and nitrogen oxides, particulate matter, and volatile organic compounds causing adverse health impacts; from asthma and heart disease to cancer and premature death. They are already overburdened with multiple sources of pollution concentrated in their neighborhoods while also experiencing the first and worse impacts of the climate crisis. The recent explosion at Freeport LNG in Texas<sup>7</sup> only amplifies our concerns about the undue health and safety risks of LNG exports. Moreover, rising energy prices caused by escalating LNG exports exacerbates the economic hardships and adverse health impacts of under-resourced and communities of color who experience high energy burdens and insecurity.<sup>8</sup>

As long as the DOE utilizes outdated guidelines, the Department will continue to authorize LNG exports that are not in the best public interest and inconsistent with the National Gas Act, allowing for these injustices to persist for generations. Furthermore, it directly conflicts with the Biden Administration's climate and environmental justice commitments. This almost 40-year old policy guidance is inappropriately based on imports and fails to account for the scope and magnitude of impacts of large-scale LNG exports on environmental justice communities, climate change, health and safety, and domestic energy prices and other essential commodities. DOE also uses unspecified criteria and varying methods of assessment of export projects – leaving stakeholders, particularly Gulf communities where the LNG export industry is centered unclear about its decision-making process and limited opportunity or avenues to provide input.

The continued greenlighting of LNG projects that perpetuate climate change impacts, safety risks, as well as economic and public health burdens for frontline communities cannot stand. We join Sierra Club and accompanying organizations from their 2013 rulemaking petition, in calling for DOE to (1) update and revise the guidelines for LNG exports, and (2) to open a transparent rulemaking process with a sufficient and inclusive public comment period on these guidelines or new regulations.<sup>9</sup> Additionally, as the petition elucidates, the “rulemaking process must 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.”

While we empathize and understand the US response to increase LNG export to support Europe as a consequence of the current international conflict,<sup>10</sup> it is even more crucial that DOE establishes a clear, coherent, and modernized policy framework for LNG exports in addition to providing a public forum to garner comments and feedback from communities who live with burdens of the LNG and the wider fossil fuel industry. Please see our brief that offers guidance and practical steps to achieve meaningful and robust community engagement and public participation.<sup>11</sup> These actions by DOE should result in a better evaluation and just public interest determination of LNG exports moving forward. Thank you and we welcome the opportunity to discuss this letter in further detail in the near future.

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[https://www.houstonchronicle.com/news/houston-texas/houston/article/Small-explosion-reported-at-Freeport-LNG-plant-17228265.php?utm\\_source=twitter.com&utm\\_medium=referral&utm\\_campaign=sftwitter](https://www.houstonchronicle.com/news/houston-texas/houston/article/Small-explosion-reported-at-Freeport-LNG-plant-17228265.php?utm_source=twitter.com&utm_medium=referral&utm_campaign=sftwitter)

<sup>8</sup> <https://www.aceee.org/research-report/u2006>

<sup>9</sup> [https://www.energy.gov/sites/default/files/2016/02/f30/Ex\\_02\\_-\\_LNG\\_rulemaking\\_petition.pdf](https://www.energy.gov/sites/default/files/2016/02/f30/Ex_02_-_LNG_rulemaking_petition.pdf)

<sup>10</sup>

<https://www.whitehouse.gov/briefing-room/statements-releases/2022/03/25/fact-sheet-united-states-and-european-commission-announce-task-force-to-reduce-europes-dependence-on-russian-fossil-fuels/>.

<sup>11</sup> <https://drive.google.com/file/d/11wR0DFGqeKd1GkxHLS4mrc3DM99mk9PS/view?usp=sharing>

Sincerely,

Coalition of Community Organizations, Texas  
South Bronx Unite, New York  
The Imani Group Inc, South Carolina  
WE ACT for Environmental Justice, New York  
West End Revitalization Association, North Carolina

CC: Ali Zaidi, National Climate Advisor, White House Climate Policy Office  
Richard Glick, Chairman, Federal Energy Regulatory Commission  
Brad Crabtree, Assistant Secretary, Office of Fossil Energy and Carbon Management,  
Department of Energy  
Shalanda Baker, Director, Office of Economic Impact and Diversity, Department of  
Energy