

09-19-2019 Comment on "Life Cycle Greenhouse Gas Perspective on Exporting Liquefied Natural Gas from the United States: 2019 Update:

First impression: The study seems to say that exported LNG generated GHGs will be less than local coal generated GHGs in the production of energy.

What about the bigger picture:

Will LNG replace or be added to the coal generated power?

Will it be cheap enough to be preferred to solar, wind, wave, and geothermal sources of power -- thus delaying and/or reducing the transition to power sources generating lower levels of GHGs than natural gas can achieve?

What about the social costs associated with the production of LNG due to the emission of other pollutants in addition to GHG emissions? Where I live, on the south most tip of Texas, NextDecade's paired Rio Grande LNG and Rio Bravo Pipeline projects, Annova LNG, and Texas LNG are seeking FERC authorization to build and operate at our local Port of Brownsville. They say their emission of the criteria pollutants will be below EPA and Texas Commission for Environmental Quality "permitted levels." But our human biology and physiology don't obey the rules, regulations, procedures, and guidelines used to determine the "permitted levels." If these facilities are built, we'll have an increase in our local rates of asthma, diabetes, COPD, and Alzheimer's dementia, etc.

How solid and realistic are the numbers related to LNG and natural gas emissions from cradle to grave? In Texas, flaring related to fracking operations are routinely ignored by TCEQ and the Railroad Commission of Texas (which has nothing to do with railroads anymore, is all about pipeline and drilling operations). And related to fracking, how high are the social costs of the high rates of miscarriages etc for folks living too close to the fracking operations? And the social costs of the dumping of fracking waste water into our rivers and streams, polluting our municipal and agricultural water resources beyond the power of our water purification systems to clean them up enough for human and animal consumption and for the watering of crops etc?

What about the emissions from leaky natural gas utility lines to household utility boxes and to the use of the gas for heating homes and cooking food etc? Are ALL the emissions included in the numbers used for the natural gas / coal comparisons?

Approving and facilitating LNG exports just on the basis lower than coal GHG emissions -- and on a minimal increase in US household incomes (costing the many to benefit the few, and disregarding such social costs as those I've mentioned above) -- would be inappropriate. Criminally negligent. Provided the cradle to grave GHG emission numbers are solid and all inclusive, then, yes, they have a place in the bigger picture along side the social cost numbers.

Using natural gas as part of a geopolitical to increase US influence and to decrease Russian influence abroad etc keeps us locked in battles that too easily spill into covert and overt military actions because of the way natural gas is distributed across national borders etc. Solar, wind, and other less polluting and more sustainable power sources are more local in

nature. They are therefore less likely to lead to armed conflicts. Oil and gas wastefully feed the military machine. The fights over solar panels and wind turbines seem be less wasteful of human lives and less damaging to our environment than fights over oil and shale fields.

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