



Federal Energy  
Regulatory  
Commission

Office of  
Energy  
Projects

September 2022

FERC/FEIS-0316

# FINAL ENVIRONMENTAL IMPACT STATEMENT for the COMMONWEALTH LNG PROJECT

## Volume III

Commonwealth LNG, LLC

Docket Nos. CP19-502-000  
CP19-502-001

Federal Energy Regulatory Commission  
Office of Energy Projects  
Washington, DC 20426

### Cooperating Agencies:



U.S. Army  
Corps of Engineers



U.S. Coast Guard



U.S. Department  
of Energy



U.S. Department  
of Transportation



U.S. Environmental  
Protection Agency



U.S. Fish and  
Wildlife Service



National Oceanic  
Atmospheric Administration -  
National Marine Fisheries Service

**APPENDIX M**  
**DRAFT ENVIRONMENTAL IMPACT**  
**STATEMENT COMMENTS AND RESPONSES**

**Part II**

# Public Meetings

April 25, 2022

1

1                   UNITED STATES OF AMERICA  
2                   FEDERAL ENERGY REGULATORY COMMISSION  
3

4   - - - - - - - - - - - - - - -x  
5   Commonwealth LNG, LLC       : Docket Nos. CP19-502-000  
6                   :                   CP19-502-001  
7   - - - - - - - - - - - - - - -x  
8

9                   COMMONWEALTH LNG PROJECT  
10

11                   Telephonic  
12

13                   Evening Meeting  
14

15                   Monday, April 25, 2022  
16

17                   The virtual public scoping/comment session, pursuant to  
18   notice, started at 6:30 p.m. (EST).   Room 1.  
19

20  
21  
22  
23  
24  
25

# Public Meetings

April 25, 2022

2

1                           VERBAL COMMENTS

2                           MS. FOX: Hi, there. My name is Nancy  
3 Fox-Hernandez, and I am an environmental project manager  
4 with the Federal Energy Regulatory Commission, or FERC. I  
5 have on the line with me my coworker, Kelley Munoz, and a  
6 court reporter. Our job is to conduct an environmental  
7 review of the Commonwealth LNG Project, and part of that  
8 process is gathering information from the public

9                           We issued our Draft Environmental Impact  
10 Statement for the Commonwealth LNG Project on March 31st,  
11 2022. We are here to listen to your comment on the Draft  
12 Environmental Impact Statement and record that comment in  
13 the FERC record for this project. Comments will be  
14 addressed in the Final Environmental Impact Statement that  
15 will be issued on September 9th, 2022.

16                           In a moment I'm going to ask you to say and spell  
17 your name for the court reporter, and then provide your  
18 comments. The court reporter will start transcribing your  
19 comment for the official record once you say and spell your  
20 name; and we will provide a warning one you have 30 seconds  
21 left for your comment. Depending on the number of people  
22 waiting, we may ask you to limit your comments to five or  
23 ten minutes. If you do not get to provide all of your  
24 comments within the time limit, you can file additional  
25 written comments using the directions provided in the Notice

# Public Meetings

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3

1 of Availability.

2 When you are finished, the court reporter will  
3 stop recording your comment. Are you ready to begin that  
4 process?

5 MR. TRITICO: Yes.

6 MS. FOX: Okay, great. Please state and spell  
7 your name for the court reporter, and then you may begin  
8 your comment.

9 MR. TRITICO: My name is Michael Tritico,  
10 M-i-c-h-a-e-l T-r-i-t-i-c-o. I represent the environmental  
11 group, Restore, R-e-s-t-o-r-e, which stands for RESTORE --  
12 Restore Explicit Symmetry to Our Ravaged Earth.

13 One comment I have is that the National Fire  
14 Protection Association standard 59A was not met by Venture  
15 Global, and I'm concerned that FERC might allow Commonwealth  
16 to also slide and not meet that fire protection standard.  
17 It's very important for the safety of the people who live  
18 near Commonwealth and the ones who pass by in boats. That's  
19 the secondary part of the problem, is ship safety; the  
20 Caucus Ship Channel is narrow at that location, and there is  
21 supposed to be an expansion of Inter-Global across to Monkey  
22 Island, where there will be two more ship berths.

23 So what's going to happen is a congested area  
24 with perhaps six different tankers being loaded  
25 simultaneously, and gasoline and LNG supertankers passing

PM1-1

PM1-1

The safety of the Terminal is discussed in section 4.12.1.

PM1-2

PM1-2

See response to comment PM1-1

# Public Meetings

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4

1 that same location. It's a very disturbing situation as far  
2 as the possibility of a very large fire, that could burn  
3 people for miles in all directions.

PM1-2

4 And the second concept I'm concerned about is  
5 that sending methane anywhere for fuel is not its highest  
6 and best use. We need methane as a chemical building block  
7 in the production of fertilizer so that we can feed the  
8 people of the planet. Only the Haber-Bosch process has been  
9 discovered in the last hundred years of people trying to  
10 figure out how to fix nitrogen. There's only one practical  
11 way to do it, and that's to use methane as a building block.

PM1-3

12 So I've calculated that for every ship of LLD  
13 that leaves, so do 220 million servings of rice, or 8  
14 million pounds of wheat. It's that much loss every time we  
15 send a ship out.

16 Another thing is the promises that Venture  
17 Global, which is right across the channel from where  
18 Commonwealth is going to be, Venture Global has promised to  
19 control light pollution and noise pollution, and neither one  
20 of those things were controlled; and I would hate to think  
21 that because FERC allowed Venture Global to fail to do what  
22 it said it could do, that you would have to therefore allow  
23 other applicants such as Commonwealth to slide and not  
24 control light and noise pollution. the light and noise  
25 pollution is not just aggravating for people, but it's

PM1-3

Comment noted. The Purpose and Need of the Project is discussed in section 1.1.

PM1-4

PM1-4

Impacts on visual resources of the Project are discussed in section 4.8.4; noise impacts of the Project are discussed in section 4.11.2; and impacts on wildlife are discussed in section 4.6.

# Public Meetings

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5

1 especially problematic for birds and aquatic creatures that  
2 depend upon light -- they use their eyes to things; and so  
3 depending on visual cues, they are interfered with by light  
4 pollution. And as far as noise, water carries noise a long  
5 way, and we have rare and endangered animals out in the Gulf  
6 that are sensitive to noise.

7 So proper control of light and noise is really  
8 important and cannot be allowed to fly like it was with  
9 Venture Global.

10 Those are my primary comments, and I may well  
11 submit further comments in writing, but I thank you for this  
12 opportunity.

13 MS. FOX: Thank you, Michael, for your comment  
14 which will be included in the public record and considered  
15 in our review of this project. You may now end the call.

16 MR. TRITICO: Okay.

17 (Pause)

18 MS. FOX: My name is Nancy Fox-Hernandez, and I  
19 am an environmental project manager with the Federal Energy  
20 Regulatory Commission, or FERC. I have on the line with me  
21 my coworker, Kelley Munoz, and a court reporter. Our job is  
22 to conduct an environmental review of the Commonwealth LNG  
23 Project, and part of that process is gathering information  
24 from the public.

25 We issued our Draft Environmental Impact

PM1-4

PM1-5

PM1-5

Impacts on marine animals are discussed in section 4.6.2.  
Impacts on threatened and endangered species are discussed in  
section 4.7.

# Public Meetings

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6

1 Statement for the Commonwealth LNG Project on March 31st,  
2 2022. We are here to listen to your comment on the Draft  
3 Environmental Impact Statement and record that comment in  
4 the FERC records for this project. Comments will be  
5 addressed in the Final Environmental Impact Statement that  
6 will be issued on September 9th, 2022.

7 In a moment I'm going to ask you to say and spell  
8 your name for the court reporter, and then provide your  
9 comment. The court reporter will start transcribing your  
10 comment for the official record once you say and spell your  
11 name; and we will provide a warning one you have 30 seconds  
12 left for your comment. Depending on the number of people  
13 waiting, we may ask you to limit your comments to five or  
14 ten minutes. If you do not get to provide all of your  
15 comments within the time limit, you can file additional  
16 written comments using the directions provided in the Notice  
17 of Availability.

18 When you are finished, the court reporter will  
19 stop recording your comment. Are you ready to begin that  
20 process?

21 MR. DENTON: Yes.

22 MS. FOX: Great. Say and spell your name for the  
23 court reporter, and then you may begin your comment.

24 MR. DENTON: Gregory Denton, G-r-e-g-o-r-y D-e-  
25 n-t-o-n.

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1        Yes, I'd just like to comment that building out  
2    fossil fuel infrastructure at this point is incompatible  
3    with the climate change that's going on. The recent IC DC  
4    reports that have come out vehemently state that we cannot  
5    continue building out fossil fuel infrastructure and keep  
6    burning fossil fuels at the rate we're burning right now.

7        So that's my major point. Also, there's -- the  
8    permit doesn't take into account the additional facilities  
9    in the area, so the cumulative effect of the exposures to  
10   people in our area is too great not to take into account.

11      And the export facility, of course, is not going to do  
12   anything to alleviate short term fossil gas type of -- and  
13   long term we have to get off, and so I'm just building out  
14   more infrastructure is going to continue the problem. We  
15   have to stop burning fossil fuels. It's the conclusion that  
16   the result of majority of countries on the planet, the top  
17   scientists, top climate scientists; and it suggests that we  
18   have to stop now.

19       So thank you very much for taking my comments.

20       MS. FOX: Thank you, Gregory, for your comment,  
21   which will be included in the public record and considered  
22   in our review of this project.

23       MR. DENTON: Great. Thank you.

24       (Pause)

25       MS. FOX: Sandra, can you hear me?

PM2-1

PM2-1

Climate Impacts of the Project are discussed in section 4.13.2.11.

PM2-2

PM2-2

See response to comment PM2-1.

PM2-3

PM2-3

Comment noted.

# Public Meetings

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9

1 comments using the directions provided in the Notice of  
2 Availability.

3 When you are finished, the court reporter will  
4 stop recording your comment. Are you ready to begin that  
5 process?

6 MS. BARBIER: Yes. Does it matter that I have  
7 submitted a written comment already?

8 MS. FOX: They are provided the same weight,  
9 whether it's written, spoken or mailed -- it's all the same

10 MS. BARBIER: Okay, fine.

11 MS. FOX: So please say and spell your name for  
12 the court reporter, and then you may begin your comment.

13 MS. BARBIER: The name is Sandra Barbier, S-a-n-  
14 d-r-a last name Barbier, B-a-r-b-i-e-r. Comments are  
15 regarding the Commonwealth LNG Project, and these are my  
16 points.

17 First, that it is counter to a sincere effort to  
18 reduce and stop global warming and climate change. Coastal  
19 Louisiana is among the most vulnerable places in the world  
20 to climate change, not just in the future but immediately.  
21 It means the loss of land, of homes, of cities, of industry  
22 and wildlife habitat for the state.

23 Second point is that the project will destroy  
24 dozens of acres of important and dwindling coastal chenier  
25 habitat. It is a very special kind of habitat in coastal

PM3-1

PM3-1 See response to comment PM2-1.

PM3-2

PM3-2 Impacts on chenier habitat are discussed in section 4.5.2; impacts on wildlife and migratory birds are discussed in sections 4.6.1.2 and 4.6.1.3; and impacts on threatened and endangered species are discussed in section 4.7.

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1 Louisiana. The project will harm wildlife; especially a  
2 threatened species, the Black rail.

PM3-2

3 Besides the rail, the rate of extinction  
4 worldwide of species, and especially the bird populations of  
5 our hemisphere, demand that we protect birds and wildlife  
6 and stop treating them as expendable. And of course, what  
7 affects wildlife will affect humans.

8 And lastly, the problems of global warming, air  
9 pollution, habitat loss and the accelerating extinctions of  
10 species that is human-caused in modern times have to be  
11 addressed now and not later. It means stopping projects in  
12 the current time, now, such as this one, the Commonwealth  
13 LNG Project, and adopting alternatives. The project is the  
14 opposite of the move towards alternative energy for this  
15 country.

PM3-3

PM3-3

See response to comment PM2-1.

16 Thank you, that's my comment.

17 MS. FOX: Thank you, Sandra, for your comment,  
18 which will be included in the public record and considered  
19 in our review of this project.

20 MS. BARBIER: Thank you.

21 (Pause)

22 [Thereupon, at 7:30 p.m. (CST), the conference  
23 call disconnected.]

24

25

# Public Meetings

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14

1 seconds left for your comment. We ask that you try to limit  
2 your comments to five minutes tonight.

3 If you do not get to provide all of your comments  
4 within that time limit you can file additional written  
5 comments using the directions provided in the Notice of  
6 Availability. When you are finished the Court Reporter will  
7 stop recording your comments. Are you ready to begin that  
8 process?

9 MS. YODER: Yes.

10 MR. HANOBIC: Okay. When you're ready you can  
11 state and spell your name for the Court Reporter, and then  
12 the time will start. Once you are complete with that you  
13 can begin your comment.

14 MS. YODER: Great thanks. My name is Naomi  
15 Yoder, N-A-O-M-I Y-O-D-E-R. And can I go ahead then?

16 MR. HANOBIC: Yep go ahead.

17 MS. YODER: Okay great. So I appreciate the  
18 opportunity to be able to comment on the Commonwealth EIS.  
19 I support the no action alternative, and I also have some  
20 concerns about the DEIS as it stands.

21 So one in particular, there's the first page, or  
22 the first mention of greenhouse gas emissions as being  
23 significant, or insignificant, DEIS, the EIS is not  
24 characterizing the proposed project's greenhouse gas  
25 emissions as significant or insignificant because the

PM4-1

PM4-1

Climate change and GHG impacts of the Project are discussed in  
section 4.13.2.11.

# Public Meetings

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15

1 Commission is conducting engineer (audio dropped) to  
2 determine whether and how the Commission will conduct  
3 significant determinations going forward.

PM4-1

4 So I urge FERC to consider that greenhouse gas  
5 emissions of you know 3 million metric tons per year, 3  
6 million tons per year are pretty significant, and that I  
7 also urge FERC to use the guidelines that have been proposed  
8 to account for greenhouse gas emissions, and climate change  
9 in all of the projects.

10 And basically I'm urging a very rigorous process  
11 of determining significance of greenhouse gas emissions, and  
12 essentially limited what greenhouse gas emissions should be  
13 allowed in a new project.

14 There are extraordinary environmental impacts of  
15 this project. I have done a full review of the air  
16 pollution that would be created from just the operation of  
17 this plant, not to mention the construction and if there  
18 should be any kind of an accident.

19 In the permit for the air permit, Cameron LNG  
20 would be allowed to produce thousands of tons of pollutants  
21 per year. Just an extraordinary amount. I spoke with --  
22 personally spoke with the chemist, Dr. Wilma Subra who has  
23 reviewed a lot more air permits than I have, and knows a lot  
24 more about the chemistry and the effects of air pollutants  
25 on public health.

PM4-2

PM4-2

Impacts of the Project on air quality are discussed in section  
4.11.1.

# Public Meetings

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16

1           And she said that these emissions, plus the  
2    emissions of the other surrounding close by LNG plants that  
3    would be operating at the same time, this would be a deadly  
4    situation. So that is unacceptable. Southwest Louisiana is  
5    not a sacrifice zone, and I was there, I recreate there. It  
6    is not something that I want to see happen there, so I  
7    support the no action alternative, and also want to just  
8    reinforce that I request that FERC do a complete accounting  
9    of greenhouse gas emissions for the lifecycle of the  
10   project.

11           In addition to that would urge FERC to also  
12    evaluate because I didn't see it yet, in the DEIS, the  
13    impact of climate change on the terminal. So I also want an  
14    accounting of how this project would contribute to climate  
15    change, but then turning it around, the impact of climate  
16    change on this terminal has the potential to be  
17    extraordinary.

18           Right on the Gulf of Mexico in the Calcasieu Ship  
19    Channel this is ground zero for unadjusted locations in the  
20    United States. Sea level rise and land loss are at higher  
21    rates than many other places in the nation -- the second  
22    highest in Louisiana, it's Cameron Parish.

23           So this is not a beautiful place, you build an  
24    LNG terminal and create all of this new industry that will  
25    -- all of this new facility, infrastructure that will

PM4-2

PM4-3

PM4-3

Safety of the Terminal is discussed in section 4.12.1. Climate change is addressed in section 4.13.2.11.

# Public Meetings

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17

1 pollute and ultimately not serve the people or the  
2 eco-system. So anyway I guess I wanted to also state about  
3 that that in Louisiana, but all along the Gulf Coast  
4 hurricanes have been increasing in intensity and regularity  
5 as you know, increasing in intensity and frequency due to  
6 climate change.

7 So this terminal will contribute to more of that.

8 And I don't see anything in the DEIS that talks about you  
9 know what will happen to the residents of Cameron Parish and  
10 Calcasieu Parish then in Jefferson County in Texas, and the  
11 other places that will be impacted by more hurricanes that  
12 come through the Gulf Coast in the region of Commonwealth.

13 This is not insignificant. It's critical that  
14 the FERC take into account the cost of disaster recovery,  
15 and taking disaster justice into account when thinking about  
16 disaster recovery. We are still as we speak we still have  
17 you know unbuilt, unrenewed structures all throughout  
18 Southwest Louisiana, which have been ruined in downtown Lake  
19 Charles, which is not that far from Commonwealth.

20 There are still the big Capital One building that  
21 has windows blown out still. And this is you know going on  
22 two years after Hurricane Laura hit us. So I just urge you  
23 to consider really what that means if there were to be -- as  
24 there will be more hurricanes, but then also the siting of  
25 this -- the preferred siting of this terminal is very close

PM4-3

PM4-4

PM4-4

See response to comment PM2-1.

# Public Meetings

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18

1 to the coast, and therefore would receive the biggest impact  
2 from hurricane storm surge, and hurricane force winds.

3 So the other thing that I'm very concerned about,  
4 and that I don't see enough information about in the DEIS is  
5 safety. Proposed safety of the terminal, and all of the  
6 chemicals stored at the terminal, but also the vessels. The  
7 Calcasieu Ship Channel is a busy place, and this proposal  
8 would be enormous stressed vessels on both side of the  
9 Calcasieu Ship Cannel at the mouth where it is the  
10 narrowest.

11 So I think that it doesn't seem like a question  
12 to me that that's a bad idea, but I guess what I would like  
13 to see the DEIS -- the Environmental Review cover is the  
14 impact of that additional shipping, and the bottleneck that  
15 could occur, and that would occur when there are ships  
16 waiting to load, or unloading, or loading I'm sorry, at the  
17 same time, and then trying to navigate at the same time.

18 And you know heaven forbid in a hurricane. You  
19 know what happens at that point when enormous tankers need  
20 to, or are in the middle of filling and have to decide what  
21 to do. So if we have an LNG tanker that is tethered at the  
22 time of a hurricane you know, what will that do, as well as  
23 the LNG plant itself.

24 So after Hurricane Laura we saw a nearby LNG  
25 terminal, Cameron LNG was closed for two months you know,

PM4-4

PM4-5

PM4-5

Safety of the Terminal and LNG vessels is discussed in section 4.12.1. As discussed in section 1.2.3, the U.S. Coast Guard (USCG), conducted an extensive review of Commonwealth's Waterway Suitability Analysis (WSA) and issued a Letter of Recommendation for the Project on March 7, 2019 noting the suitability of the Calcasieu Ship Channel to safely handle vessel traffic related to the Project in addition to the vessel traffic of other companies present on the Calcasieu Ship Channel. On April 19, 2022, Commonwealth provided a Waterway Suitability Assessment Update to the USCG, as requested in the LOR to be conducted once the Venture Global Calcasieu Pass Project was operational.

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1 and that's not addressed at all in the DEIS and in the other  
2 environmental reviews from Commonwealth that a hurricane  
3 it's not only that there could be a disruption in the  
4 company's output, but that there could be you know a  
5 catastrophic effect.

PM4-5

6 So that's not acceptable. And there's no reason  
7 that that should be pushed forward. The only reason it  
8 seems like that's being pushed forward is because Cameron  
9 Parish is being treated as so it's disposable.

10 And the last thing that I want to talk about is  
11 the endangered species in the area, so especially the  
12 Eastern Black Rail. And I have been in contact, I'm a  
13 scientist and I've been in contact with the scientists that  
14 have reviewed the populations of Eastern Black Rail, and  
15 it's in a critical place. It's a federally threatened  
16 species, and this terminal will be on top of one of the  
17 very few sites where Eastern Black Rails are most likely to  
18 live in Louisiana.

PM4-6

19 And over the past 10 years there have been -- oh  
20 no, I'm sorry fewer years than that, but in the past few  
21 years there have been about 300 surveys for Eastern Black  
22 Rail in Louisiana, and there have only been 15 or 16 by  
23 itself. So you get a sense of how rare this bird is, and to  
24 have a terminal being built on top of that habitat for this  
25 extremely rare bird, it just seems actionable, and we

PM4-6

Impacts on Eastern Black Rail are discussed in section 4.7.1.2.

# Public Meetings

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20

PM4-6

1 shouldn't be allowing that. So that's the end of my  
2 comments thank you.

3 MR. HANOBIC: Thank you very much for your  
4 comment. Your comment will be put in the FERC record for  
5 this project. Thank you.

6 MS. YODER: Great, thank you so much.

7 MR. HANOBIC: Hi can you hear me?

8 MS. BENOIT: Hello?

9 MR. HANOBIC: Can you hear me?

10 MS. BENOIT: Yes I can.

11 MR. HANOBIC: All right. My name is David  
12 Hanobic. I'm an Environmental Project Manager with the  
13 Federal Energy Regulatory Commission or FERC. I have on the  
14 line with me a consultant John Brewer, who is our contractor  
15 for Cardno, and also a Court Reporter. Our job is to  
16 conduct an environmental review of the Commonwealth LNG  
17 Project, and part of that process is gathering information  
18 from the public.

19 We issued our Draft Environmental Impact  
20 Statement for the Commonwealth LNG Project on March 31,  
21 2022. We are here to listen to your comment on the Draft  
22 Environmental Impact Statement, and record that comment in  
23 the FERC records for this project.

24 Comments will be addressed in the Final  
25 Environmental Impact Statement that is being produced. In a

# Public Meetings

April 25, 2022

21

1 moment I am going to ask you to state and spell your name  
2 for the Court Reporter, and then provide your comment. The  
3 Court Reporter will start transcribing your comment for the  
4 official record once you state and spell your name, and we  
5 will provide a warning once you have approximately 30  
6 seconds left.

7 Currently we're probably looking at a five minute  
8 time limit. If you do not get to provide all of your  
9 comments within the time limit, you can file additional  
10 written comments using the directions provided in the Notice  
11 of Availability. When you are finished the Court Reporter  
12 will stop recording your comment. Are you ready to begin  
13 that process?

14 MS. BENOIT: Yes.

15 MR. HANOBIC: Okay. Please state and spell your  
16 name for the Court Reporter, and then you may begin your  
17 comment when you are done doing that. Go ahead.

18 MS. BENOIT: Mona, M-O-N-A Benoit,  
19 B-E-N-O-I-T.

20 MR. HANOBIC: You can begin your comment.

21 MS. BENOIT: Yes. I wish to -- our environment  
22 is full of breathing in all this stuff. we don't need  
23 anymore we've got more than enough here, so that's enough.  
24 We don't need it all here. So we don't need any more plants  
25 here. Go build it somewhere else. Thank you.

PM5-1

PM5-1

Purpose and Need of the Project is discussed in section 1.1. Air  
impacts of the Project are discussed in section 4.11.1.

# Public Meetings

April 26, 2022

23

1 CERTIFICATE OF OFFICIAL REPORTER

2

3 This is to certify that the attached proceeding

4 before the FEDERAL ENERGY REGULATORY COMMISSION in the

5 Matter of:

6 Name of Proceeding:

7 Commonwealth LNG, LLC

8

9

10

11

12

13

14 Docket No.: CP19-502-000; CP19-502-001

15 Place: Virtual

16 Date: Monday, April 25, 2022

17 were held as herein appears, and that this is the original

18 transcript thereof for the file of the Federal Energy

19 Regulatory Commission, and is a full correct transcription

20 of the proceedings.

21

22

23 Gaynell Catherine

24 Official Reporter

25

## Public Meetings

April 26, 2022

1

9 COMMONWEALTH LNG PROJECT

16 Tuesday, April 26, 2022

18 The virtual public scoping/comment session, pursuant to  
19 notice, started at 3:30 p.m. (EST).

# Public Meetings

April 26, 2022

4

1                   MR. ALLAIRE: All right, great.

2                   MS. FOX: All right. So you can say and spell  
3 your name, and as soon as you do that you can begin your  
4 comment.

5                   MR. ALLAIRE: All right, my name is John, J-o-h-n  
6 Allaire, A-l-l-a-i-r-e. I own land adjoining, 300 acres  
7 adjoining the Commonwealth LNG facility. I'm concerned  
8 about what they're going to do in the wetlands over here,  
9 but I'm referring to a letter from the Office of Coastal  
10 Management of March 15, 2022 to Commonwealth LNG where they  
11 determined they're unable to continue processing of their  
12 application until they receive the following information  
13 about drainage concerns on the adjoining land.

14                  So that wasn't part of the EIS, Draft EIS. And  
15 also, on March 31, 2022, FERC wrote a letter to the National  
16 Marine Fisheries Service requesting that they review that  
17 Environmental Impact Statement. And in the footnotes on  
18 that document, the U.S. Army Corps of Engineers stated, as  
19 of March 31st, 2021, the Corps has not completed its  
20 accounting of acreage of wetlands that is considered to be  
21 tidal influenced at the LNG terminals site. Therefore, the  
22 final acreage of the essential fish habitat that would be  
23 affected by construction of the project could vary from  
24 what's presented here.

25                  I'm concerned that that information is critical

PM6-1

PM6-1

Section 4.4.2 describes the hydrologic modeling conducted by Commonwealth for the proposed stormwater culvert. Commonwealth proposes to consult with NMFS and other federal and state agencies for the specific design of the stormwater culvert, which would be determined during Front End Engineering and Design prior to the beginning of construction.

PM6-2

PM6-2

Section 4.4.2 provides an updated accounting of wetland impacts and Commonwealth's proposed wetland mitigation plan.

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1 to the public making intelligent comments about the  
2 environment impact of the project, so we don't have a  
3 complete set of data, and the Corps of Engineers doesn't.  
4 And the State Office of Coastal Management is not happy with  
5 the drainage plan that Commonwealth has come in. So that's  
6 been excluded from the environmental assessment.

PM6-2

7 The next comment I have, Commonwealth states the  
8 purpose of their project is to liquefy and export -- to  
9 export LNG to foreign markets, domestically produced gas. In  
10 a document produced by the U.S. Energy Information  
11 Administration in August of 1921, they stated specifically  
12 that the natural gas price rises in 2021 and into 2022 are  
13 primarily, reflect just two factors: Growth in LNG exports  
14 and rising consumption for sectors other than the electric  
15 power industry, which has been pushed into using more coal  
16 in 2021 and 2022 because of the high price of natural gas.

PM6-3

PM6-3

Comment noted. Purpose and Need of the Project is discussed in section 1.1.

17 My comment No. 3 is about the construction of the  
18 terminal's marine facility. Their analysis of the area that  
19 would be affected by this, which is mostly in tidal  
20 estuarine habitat and some emergent forest in the cheniers.  
21 They describe the area as soft, unconsolidated sediments in  
22 the project area that experience frequent cycles of tidal-  
23 related scour and organisms that would therefore quickly  
24 recover after construction.

PM6-4

PM6-4

Section 4.4.1.1 has been revised to indicate the intertidal mudflats present within the proposed footprint of the marine facility are considered a "special aquatic site" by the COE under Section 404 of the CWA. Additionally, section 4.6.2 and 4.6.3 have been revised to recognize the presence of oyster reef habitat at this location as well.

25 I've been fishing that area, that entire flat

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1 area for over 24 years, and the sediments in the area are  
2 neither soft or unconsolidated. More rock walked off the  
3 south jetty -- the sediments in that flat would stabilize  
4 and provide a unique habitat that supports oysters,  
5 barnacles, a variety of crabs and bait fish. Every  
6 evening large predator fish such as red drum, sea trout,  
7 flounder go out into that flat to feed on the fish. This  
8 site is a prize location for local fishing guides to bring  
9 their clients. If you performed a survey of the area's  
10 local fishing guides, that will confirm my observations and  
11 statement.

12 Another issue. Under Wildlife Resources on page  
13 1-5 of your introduction, they talk about the primary  
14 impacts of wildlife from the construction of the terminal  
15 and the pipeline and the plant, and state that operation of  
16 the terminal will result in increased noise, lighting and  
17 human activity that would disturb wildlife in the area; and  
18 reduction of usable habitat to promote wildlife species  
19 currently inhabiting the area.

20 And you go on to say: However, due to the  
21 existing ship traffic and other industrial uses, there is  
22 much that, those wildlife have already been affected.

23 Absolutely not correct. Those existing cheniers,  
24 those tree lines provide a shield that prevent that exact  
25 thing from happening, and by removing all that estuarine

PM6-4

PM6-5

PM6-5

Commercial fishing impacts are discussed in section 4.9.7; FERC has not received any comments on the Project from any local fishing guides or commercial fisheries representatives. Recreational fishing is discussed in section 4.8.3.1.

PM6-6

PM6-6

Wildlife is addressed in section 4.6.1 and this information has been updated.

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1 forest and estuarine emergent marsh, the roads in that,  
2 you're just removing the exact thing that shields the water  
3 fowl and the wading birds for those type of conditions to  
4 happen.

PM6-6

5 So I've got several other comments, but at this  
6 time I think I'll submit the balance of them in writing.

7 MS. FOX: Thank you so much, John, for your  
8 comment, which will be included in the public record and  
9 considered in our review of the project.

10 MR. ALLAIRE: Okay. I have one other comment.

11 Is it too late to put this in? Very short one.

12 MS. FOX: No. You can go ahead.

13 MR. ALLAIRE: Okay. Looking at the project  
14 goals, as I said, to export LNG to foreign entities, in  
15 Socioeconomics they discuss: the project would result in  
16 minor positive economic impacts due to increase in  
17 construction jobs, payroll taxes, purchases made by  
18 workforce. And: The operation of the project would have a  
19 minor positive effect in local government tax revenues due  
20 to increase in property taxes, but would have no significant  
21 impact on local populations, employment, provision of  
22 community service, housing or property values.

PM6-7

PM6-7 Comment noted.

23 On page 29, these minor positive impacts are  
24 associated with the proposed project. But the primary --  
25 and on page 26 of this document, your introduction, the

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1 primary impacts of wildlife, construction of the terminal,  
2 pipeline would be loss of estuarine emergent scrub, scrub,  
3 and forest and wetland habitats and chenier habitats which  
4 provide nutrients, cover, shelter, water for a variety of  
5 terrestrial and aquatic species including water fowl, wading  
6 birds, nesting birds, raptors, mammals, reptiles, amphibians,  
7 construction of the terminal and said pipeline would cause  
8 displacement, stress, direct mortality of individual  
9 wildlife species that use these types of habitats.

10 Operation of the terminal would result in  
11 increased noise, lighting, human activity that could disturb  
12 wildlife in the area and a reduction of usable habitat for  
13 most wildlife species currently inhabiting the area. And  
14 that -- I am quoting directly from page 1-5 in your  
15 introduction.

16 So there is no way that these minor positive  
17 economic impacts and the goal of Commonwealth export  
18 domestic LNG overseas is, will overwhelm the need to go no  
19 further action on this permit.

20 All right. Now I think I'm done, Miss Nancy.

21 MS. FOX: Okay, great. Thank you so much for  
22 your comments, John, and we will include them in the record.

23 MR. ALLAIRE: All right. Thank you all for  
24 letting us get a word in.

25 MS. FOX: Okay, bye.

PM6-7

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1 limit, you can file additional written comments using the  
2 directions provided in the Notice of Availability.

3 When you are finished, the court reporter will  
4 stop recording your comment. Are you ready to begin the  
5 process?

6 MS. HOPKINS: Sure.

7 MS. FOX: Okay. Please say and state your name  
8 for the court reporter, and then you may begin your comment.

9 MS. HOPKINS: My name is Lees Hopkins, L-e-e-s  
10 H-o-p-k-i-n-s. I am opposed to the Commonwealth Liquefied  
11 Natural Gas facility. It is not going to -- we are not  
12 going to be able to meet our climate goals as a State, and  
13 from what I understand about the Louisiana Action Plan, you  
14 know -- if this plant goes through, we're not going to be  
15 able to make those targets, and I would like our State to be  
16 working in collaboration with the rest of the planet to  
17 fight climate change and not approve facilities like this.

18 I also understand that this report doesn't look  
19 at the kind of cumulative impacts of all of the already-  
20 existing types of facilities in the area, and that's  
21 concerning because it's not just one more facility. In fact,  
22 it's one more facility on top of many other facilities in  
23 the area, and I know that air pollution is a big issue, and  
24 I'm also concerned about potential other issues that can  
25 come up, pollution-wise, leaked, what have you; accidents,

PM7-1

PM7-1 See response to comment PM2-1.

PM7-2

PM7-2 Cumulative Impacts of the Project area addressed in section 4.13; air quality impacts are discussed in section 4.11.1; and the safety of the Terminal is discussed in section 4.12.1.

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11

1 explosions. None of that's okay with me. And I want this  
2 liquefied natural gas plant to not exist in Louisiana.

3 That's all I have to say.

4 MS. FOX: Okay, thank you so much for your  
5 comment, which will be included in the public record and  
6 considered in our review of the project.

7 MS. HOPKINS: Thank you very much. Bye.

8 MS. FOX: Thank you. Bye.

9 (Pause)

10 MS. FOX: Hi there, John, can you hear me?

11 MR. ALLAIRE: I can, Nancy.

12 MS. FOX: Hi there, again. I'm not going to read  
13 this whole thing to you again because you already know  
14 the --

15 MR. ALLAIRE: Oh, yes.

16 MS. FOX: If you want to just -- if you'd say and  
17 spell your name for the court reporter, you can begin your  
18 comment.

19 MR. ALLAIRE: Already. My name is John, J-o-h-n  
20 Allaire, A-l-l-a-i-r-e. I am an adjoining landowner to the  
21 proposed Commonwealth LNG site. Back in 2021 I submitted  
22 comments with regard to the air permit modeling information  
23 source that Commonwealth LNG. They chose to use the Lake  
24 Charles Regional Airport, that is 41 kilometers away from  
25 the site, rather than the NOAA weather station which is

PM7-2

PM8-1

PM8-1

As noted in section 4.11.1.6, use of the Lake Charles Regional Airport is based on guidance specified by LDEQ in its Modeling Procedures, the publishing date notwithstanding. In written communication provided to Commonwealth on June 16, 2022 (see appendix C of accession number 20220624-5165), LDEQ confirmed its approval of Commonwealth's use of this meteorological station.

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1 located 750 meters from the site.

PM8-1

2 And in the follow up document, in the EIS, they  
3 stated that this Lake Charles airport was used based on  
4 guidance specified by the LDEQ and a procedures document  
5 that was written in 2006, over 16 years ago. They go on to  
6 say that generally the PST significant analysis considers  
7 missions only associated with this project, and compares  
8 model concentrations to corresponding significant impact  
9 levels.

10 Since they did all of their modeling, they didn't  
11 do any actual sampling. The Venture Global facility, which  
12 was commissioned beginning in the end of January and began  
13 flaring January 27th of 2022, and I've been a witness that  
14 over the last three months, up until today -- and I have  
15 documentary evidence and I've filed complaints with Venture  
16 Global and the DEQ -- other than six days during that 88 day  
17 period they've been flaring continuously, night and day, 24  
18 hours a day, 7 days a week. And as I said, there was only  
19 six days during that entire time that they have, not having  
20 one or both of their flares going.

PM8-2

PM8-2

The design of the Calcasieu Pass LNG project is substantially different what is proposed by Commonwealth; therefore, the expected flaring durations of the two facilities cannot be compared directly. Revised flaring duration for the Commonwealth LNG Project is provided in provided in sections 2.1.1.4, 4.6.1.3, and 4.11.2.4.

21 On a separate matter, at the beginning of this  
22 document, FERC describes the equipment that Commonwealth LNG  
23 will be operating, and they describe two flare systems as  
24 the major part of their operational safety equipment. In  
25 every document that I've seen over the last two years that

PM8-3

PM8-3

Section 2.1.1.4 clarifies that there would be two flare stacks, one for the liquefaction facility and one for the marine facility. The liquefaction flare stack would contain three individual flares and the marine facility would contain one flare.

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1 Commonwealth has submitted to FERC and the agencies, they've  
2 always described four flares; a marine flare, a high  
3 altitude flare, dry flare, a wet flare and also a spare  
4 flare. So there's four flares that are associated with this  
5 project; a wet system, a day system and a marine system. So  
6 what's stated in the EIS is not accurate if the  
7 Commonwealth LNG documents are accurate.

8 Additionally, in the FERC document, in the  
9 introduction, they discuss that my property, my residence is  
10 3300 feet away from the boundary of the Commonwealth  
11 operating facility. Well, my residence is actually 1750  
12 feet from their proposed flare location and less than 2200  
13 feet away from their main compression and liquefaction  
14 equipment. So I'd like to get that corrected for the  
15 record. And I need to have it evaluated.

16 So in conclusion, I think their air modeling,  
17 which is done from a source 41 kilometers away up in town,  
18 has nothing, can't be compared to a NOAA weather station  
19 that's 750 meters from the site. Obviously there are  
20 different air conditions, meteorological conditions at the  
21 coast than there is up at Lake Charles.

22 I've asked repeatedly about this, and I would  
23 like the FERC to request, and the DEQ to request, that they  
24 would make some sort of comparison, all historical data is  
25 there from the NOAA weather station, and they have all the

PM8-3

PM8-4

PM8-4

The residence referred to that is 3,300 feet from the boundary of the Terminal is the residence that houses the Calcasieu Ship Channel Pilots. Section 4.11.2 notes the RV pad that serves as a secondary residence for the commenter is 1,962 feet west of the closest Terminal structures.

PM8-5

PM8-5

See response to comment PM8-1.

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1 historical data from the Lake Charles Regional Airport.  
2 So I think it's only fair to compare those data  
3 sources to at least say that they're somewhat analogous,  
4 because the key to accurate air modeling is to have accurate  
5 data in, gives you accurate data out. So I would request  
6 that that study be conducted to verify if they're using the  
7 Lake Charles airport, if that's the same.

PM8-5

8 And the PSD significant analysis is considering  
9 only the emissions from this project, and again Venture  
10 Global has been flaring and emitting phyto carbons and NOX,  
11 particulate matter and black clouds. I have photographic  
12 evidence, all date and time stamped, to validate my claims  
13 on this issue.

PM8-6

PM8-6

The PSD significant analysis is for emissions from the Project  
and is independent of other facilities.

14 And that's what I have today so far, Nancy.

15 MS. FOX: Well, thank you very much, John, for  
16 your comment, your additional comments. We will include  
17 them in the public record and consider them in our review of  
18 the project.

19 MR. ALLAIRE: Thank you very much for your time  
20 today.

21 MS. FOX: Okay, thank you. Bye.

22 (Pause)

23 MS. FOX: Hi there, can you hear me?

24 MR. ALLAIRE: I can, Nancy.

25 MS. FOX: Oh, hello John, again.

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15

1                   MR. ALLAIRE: Hello, Nancy, again.

2                   MS. FOX: Feel free to just -- I think the court  
3 reporter has the spelling of your name, so feel free to just  
4 go ahead and state your comment.

5                   MR. ALLAIRE: All right. John Allaire again.

6                   In the Draft EIS document, I'm concerned about  
7 Appendix G. Appendix G is the list of the document  
8 preparers for this Draft EIS. Of the 36 document preparers,  
9 none of the academic records presented in this appendix  
10 indicates that any of the preparers of the document attended  
11 a Louisiana institution of higher learning or university in  
12 the State of Louisiana.

13                   I think that there could be some potential bias  
14 here against the State of Louisiana; the fact that none of  
15 the preparers listed have attended a university or  
16 institution of higher learning in the State of Louisiana.

17                   That's my comment with regard to that.

18                   MS. FOX: Okay, great. Thank you so much for  
19 your comment. You have about 20 minutes left to call in  
20 with another one.

21                   MR. ALLAIRE: All right. Thank you, ma'am.

22                   MS. FOX: Have a good evening.

23                   (Pause)

24                   MS. FOX: Hi, there. My name is Nancy Fox-  
25 Hernandez, and I am an environmental project manager with

PM8-7

PM8-7

The preparers of the document are educated professionals that are objectively assessing the impacts of the Project on the environment. There is no cause for any of the preparers to harbor any bias against the State of Louisiana. Additionally, the cooperating agencies reviewing this Project, including the COE and NMFS, have field offices in Louisiana.

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1 the Federal Energy Regulatory Commission, or FERC. I have  
2 on the line with me my coworker Jenifer Fink, and John  
3 Brewer, and a court reporter.

4 My job is to conduct an environmental review of  
5 the Commonwealth LNG Project, and part of that process is  
6 gathering information from the public.

7 We issued our Draft Environmental Impact  
8 Statement for the Commonwealth LNG Project on March 31st,  
9 2022. We are here to listen to your comment on the Draft  
10 Environmental Impact Statement and record that comment in  
11 the FERC record for this project. Comments will be  
12 addressed in the Final Environmental Impact Statement that  
13 will be issued on September 9th, 2022.

14 In a moment I'm going to ask you to say and spell  
15 your name for the court reporter, and then provide your  
16 comments. The court reporter will start transcribing your  
17 comment for the official record once you say and spell your  
18 name.

19 When you are finished, the court reporter will  
20 stop recording your comment. Are you ready to begin the  
21 process?

22 MS. ROLLO: Yes.

23 MS. FOX: Okay. Please say and state your name  
24 for the court reporter, and then you may begin your comment.

25 MS. ROLLO: Vera, V-e-r-a Rollo, R-o-l-l-o.

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1 MS. FOX: You can start the comment.  
2 MS. ROLLO: I am against this deal they're  
3 talking about. If it's not going to do anything for us,  
4 that's no good. So I'm against it. If we're not going to  
5 profit from it, well, that's not good.

PM9-1

6 MS. FOX: Okay. If that's all your comment, then  
7 thank you very much, Vera for your comment, and it will be  
8 included in the public record and considered in our review  
9 of the project. You can now end the call.

10 MS. ROLLO: Thank you.

11 (Pause)

12 MS. FOX: I hear John again. This is Nancy.

13 MR. ALLAIRE: John again, Nancy.

14 MS. FOX: Hello. Go ahead and say your name, and  
15 you can start your comment.

16 MR. ALLAIRE: John Allaire.

17 On page 1-10 of the introduction in the Draft  
18 Environmental Impact Statement, FERC states: Our analysis  
19 of cumulative impacts includes other projects in the  
20 vicinity of proposed Commonwealth project effects.

PM10-1

21 Same research of the project in the same  
22 approximate time frame. We generally conclude that the  
23 potential of the project combined with the impacts from the  
24 other projects considered in their geographic scopes, will  
25 not result in significant impacts on resources.

PM9-1 Comment noted.

PM10-1 Impacts on coastal wetlands and vegetation are discussed in sections 4.4 and 4.5. The cumulative impacts of the Commonwealth project on coastal wetlands and vegetation are discussed in sections 4.13.2.3 and 4.13.2.4. The cumulative impacts section assesses the combined impacts of the two (or more) projects on the respective resources at the respective project sites

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1           The Global Venture project that they're referring  
2 to here, these conclusions for the cumulative impact are  
3 based on incorrect information and lack of understanding of  
4 the area's history, preexisting and existing conditions. As  
5 90 percent of the Global Venture facility was built on pre-  
6 disturbed land. The Global Venture facility was built on  
7 land that was used to deposit dredge spoils during the  
8 construction of the Calcasieu Ship Channel in the 1920s and  
9 ongoing maintenance of the ship channel over the past 100  
10 years.

11           This changed the entire dynamic of the Global  
12 Venture site. As opposed to the Commonwealth site, where  
13 less than 15 percent of the Commonwealth marine pipeline and  
14 berth and operations facility footprint has been disturbed  
15 by other than minor human activity; less than 5 percent  
16 versus 90 percent. It's a completely inaccurate conclusion  
17 that the potential impacts of the project, Commonwealth  
18 project, when combined with the impacts of the other  
19 project considered in geographic scope, would not result in  
20 a significant impact on the resources.

21           No logical conclusion can be drawn between  
22 clearing, backfilling and concreting over these estuarine  
23 forests, cheniers, to merge in estuarine marsh and wetlands  
24 that the Commonwealth LNG facility proposed location. As  
25 opposed to the backfilled areas where the Global Venture

PM10-1

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1 facility was installed and pre-disturbed, dredge spoils.  
2 Commonwealth cannot create, duplicate or buy  
3 these chenier wetlands estuaries that took nature thousands  
4 of years to create by buying wetland offsets.

5 Additionally, on page 116 of the introduction,  
6 Commonwealth stated again that the purpose of their project  
7 is to liquefy and export to foreign markets domestically-  
8 produced natural gas. There's no reference to any transfer  
9 of gas within the United States to any consumers or  
10 industries. And yet, FERC stated that we received multiple  
11 complaints from the public stating the Commission would not  
12 approve the project due to a high number of other LNG export  
13 terminals, either currently operating or under construction,  
14 or proposed and permitted for construction in the United  
15 States.

16 The Commission is required to consider as part of  
17 its decision to authorize these facilities, all factors  
18 bearing on the public interest.

19 Have any of the people from FERC or the State  
20 agencies, have not been affected domestically by the  
21 inflation and the export of natural gas. As the USDIA  
22 stated, the increased exports of LNG have markedly increased  
23 domestic energy costs, as 38 percent of the U.S. electrical  
24 grid is generated through the use of natural gas.

25 Since January of 2021, the price of natural gas

PM10-1

PM10-2

PM10-2

The Purpose and Need of the Project is discussed in section 1.1. As noted in section 2.1, the final EIS is not a decision document. It is produced to inform the Commission of the potential impacts associated with construction and operation of the proposed Project.

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1 was \$2.74 per million BTUs -- again, this is off the U.S.  
2 Energy Information Administration's website. From January  
3 4th of '21 to January 4th of '22, the price of natural gas  
4 increased 61 percent to \$4.41 per million BTU. And as of  
5 January 4th, '22 to April 19 -- that's the latest record  
6 from the U.S. Energy Information Administration, the Henry  
7 Hub price for natural gas in the U.S. is \$7.46, a 69  
8 percent since the beginning of the year.

9 We're all being affected by this; 80 percent of  
10 our fertilizer that grows our crops and grain for our feed  
11 for our animals is generated with natural gas. The  
12 manufacturers of the fertilizer prices have doubled and  
13 tripled in the last eight months. This is one of the  
14 leading causes of inflation, is this export of natural gas  
15 to our friends and neighbors overseas.

16 The largest importer of natural gas last year in  
17 2021 was the People's Republic of China. They imported 22.3  
18 percent of our gas, went to the folks in China who are  
19 supporting Putin's war effort in Ukraine. If the public  
20 knew what's going on there and how they're paying for that,  
21 I just don't believe they'd be comfortable with that  
22 situation.

23 So I want everybody there on this call to look at  
24 your bill, your own electric bill from 2020 to 2021, 2022,  
25 and your food costs. And as the Energy Information

PM10-2

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1 Administration for the U.S. Government states: This is one  
2 of the two primary factors in LNG rising consumer rates  
3 across the United States.

PM10-2

4 And I think that's my final one, Nancy.

5 MS. FOX: Thanks so much for your comment, John,  
6 for your comments. They will be included in the record. We  
7 appreciate your input.

8 MR. ALLAIRE: All right. You all have a great  
9 evening and thank you for your time today.

10 MS. FOX: Thank you. Bye.

11 (Pause)

12 MS. FOX: Let the record show that the scoping  
13 session for the Commonwealth DEIS closed at 5:30 p.m. on  
14 April 26, 2022.

15 Thanks, everybody.

16 [Thereupon, at 5:30 p.m. (EST), the scoping  
17 session concluded.]

18

19

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21

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1 MS. FINK: Okay, so if you could just say and  
2 spell your name for the court reporter.

3 MR. ALLAIRE: Sure. My name is Paul Allaire,  
4 P-a-u-l, A-l-l-a-i-r-e.

5 MS. FINK: Okay. Great. You may begin.

6 MR. ALLAIRE: I'm very concerned about the  
7 impacts that the proposed Commonwealth LNG Export Terminal  
8 will have on the local regional, as well as global  
9 environment, in southwest Louisiana communities. I don't  
10 think that the terminal is a good idea for southwest  
11 Louisiana.

12 First of all, air pollution will be an issue.  
13 Commonwealth LNG will be a major point source polluter. The  
14 terminal will be allowed to emit almost 2,000 tons of  
15 harmful air pollution every year, more if you include the  
16 pollution of the gas fields and supply the gas export. I  
17 think the marshes and the wetlands in that area are very,  
18 very important to maintain and not destroy by the building  
19 and all that and the shipping that's going to go on there.

20 Coastal marshlands and wetlands are the first  
21 line of protection during hurricane and storm surge  
22 devastation. Wetland marshes are also very critical.  
23 They're natural carbon sinks, which can absorb carbon  
24 dioxide, also the home to many animals, which is really  
25 important, including the Eastern Black Rail, Marsh Bird,

PM11-1

PM11-1 Impacts on air quality are addressed in section 4.11.1.

PM11-2

PM11-2 Impacts on wetlands, migratory birds, and threatened and endangered species and associated mitigation are discussed in sections 4.4, 4.6.1, 4.7, and 4.13.2.11.

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1 recently listed as a threatened animal on the Endangered  
2 Species list due to habitat loss.

3 More than 70 percent of all birds that migrate  
4 in the U.S. pass through Louisiana every spring and fall.  
5 Commonwealth LNG will destroy and debilitate hundreds of  
6 acres, if not thousands, of marshes and wetlands that are  
7 important stopover points for these species. Their emission  
8 is going to add to global warming.

9 If I understand correctly, every Draft EIS must  
10 demonstrate why the project being evaluated is in the public  
11 interest. Building this Commonwealth LNG is not even close  
12 to the public interest because of all the safety and  
13 environmental concerns that I mentioned.

14 And finally, gas export terminals are counter to  
15 the U.S. goal to reduce greenhouse gas emissions to keep  
16 global warming growth at a minimal level. So, I oppose the  
17 Commonwealth LNG for all these reasons.

18 MS. FINK: Okay. Well, thank you so much for  
19 your comment and you can disconnect if you're finished.

20 MR. ALLAIRE: Bye-bye.

21 MS. FINK: Can you hear me?

22 MR. SIMON: Yes, ma'am, I can.

23 MS. FINK: Hi. My name is Jenny Fink and I'm an  
24 project manager with the Federal Energy Regulatory  
25 Commission. I have on the line with me a -- hello?

PM11-2

PM11-3

PM11-4

PM11-3 The EIS is not a decision document. The purpose and scope of  
the EIS are provided in section 1.2.

PM11-4 See response to comment PM2-1.

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1 spell your name for the court reporter.

2 MR. SIMON: Okay. My name is Matthew Simon,

3 M-a-t-t-h-e-w, S-i-m-o-n.

4 MS. FINK: Okay. You can begin your comment.

5 MR. SIMON: Yes, ma'am. Okay. Hello, my name  
6 is Matthew Simon. I'm opposed to the Commonwealth LNG  
7 Export Terminal. I am worried about the adverse effects of  
8 the people and wildlife of Cameron, as well as the global  
9 environmental impact that it will cause.

10 I'm a retired professional engineer. I've lived  
11 all my days here in Louisiana. I often drive to the area in  
12 question to enjoy and observe the wildlife and the ecosystem  
13 and I also enjoy fishing there.

14 My first note is to air pollution. I understand  
15 the proposed LNG terminal will emit almost 2,000 tons of air  
16 pollution, which includes carcinogens each year. I'm  
17 concerned about the impact on the people of the Town of  
18 Cameron, the Town of Hackberry, and those that reside in  
19 nearby Holly Beach. Of course, I'm also concerned with the  
20 negative impact on the wildlife.

21 Second note concerns loss of area marsh and  
22 wetlands. Louisiana is losing coastline annually. The LNG  
23 terminal plan includes dredging and disposing of wetlands  
24 that Louisiana is trying to keep and build up. This is  
25 counterproductive. Another site needs to be considered,

PM12-1

PM12-1 Socioeconomic impacts of the Project are discussed throughout section 4.9; the impacts on wildlife are discussed in section 4.6.1; impacts on air quality are discussed in section 4.11.1; and the climate impacts of the Project are discussed in section 4.13.2.11.

PM12-2

PM12-2 Impacts on air quality are discussed in section 4.11.1.

PM12-3

PM12-3 Impacts on wildlife are discussed in section 4.6.1.

PM12-4

PM12-4 Impacts and mitigation related to coastal wetlands are addressed in sections 4.4 and 4.6.2. While dredging would not occur in wetlands habitat the Terminal would permanently fill about 90 acres of wetlands. Commonwealth would mitigate for impacts on wetlands at the Project site through purchase of COE-approved wetland mitigation bank credits. Additionally, Commonwealth would transport sediment from dredging activities at the Project site to Cameron Prairie National Wildlife Refuge for the FWS' use in restoring wetlands habitat.

# Public Meetings

April 26, 2022

29

1 according to my opinion.

2 Third note concerns noise pollution. The  
3 flaring noise is loud. It will have a negative impact on  
4 the wildlife that live and nest there. The noise from the  
5 LNG terminal across the river is loud enough. I encourage  
6 you to visit the area and experience it for yourself.

7 Fourth note is on threatened species and other  
8 wildlife. The Eastern Black Rail Marsh bird nest there and  
9 is considered threatened on the Endangered Species list.  
10 One of the reasons I visit the area is to observe the annual  
11 bird migration. A large percentage of America's birds stop  
12 in this sensitive area to rest up and eat after their flight  
13 across the Gulf of Mexico.

14 My fifth note is of public interest. I am  
15 against the idea of supporting America's cleanest burning  
16 hydrocarbon, natural gas, America needs to keep our cleanest  
17 energy reserves for our future generations, which is my  
18 opinion.

19 In closing, concerning the Draft Environmental  
20 Impact Statement, I support the no action alternative and I  
21 am concerned that the alternative analysis presented in the  
22 document is severely limited.

23 I thank you for your time and consideration.

24 MS. FINK: Hey, Matthew. Well, thank you so  
25 much for your comment.

PM12-5

PM12-5 Impacts on wildlife are discussed in section 4.6.1. General noise impacts from flaring are discussed in section 4.11.2.4.

PM12-6

PM12-6 Impacts on migratory birds are discussed in section 4.6.1.3; impacts on threatened and endangered species are addressed in section 4.7.

PM12-7

PM12-7 Purpose and Need of the Project is discussed in section 1.1..

PM12-8

PM12-8 The methods used to assess the alternatives are discussed in section 3.0.

# Public Meetings

April 26, 2022

43

1 CERTIFICATE OF OFFICIAL REPORTER

2

3 This is to certify that the attached proceeding  
4 before the FEDERAL ENERGY REGULATORY COMMISSION in the

5 Matter of:

6 Name of Proceeding:

7 Commonwealth LNG, LLC

8

9

10

11

12 Docket No.: CP19-502-000

13 CP19-502-001

14 Place: Virtual

15 Date: Tuesday, April 26, 2022

16 were held as herein appears, and that this is the original  
17 transcript thereof for the file of the Federal Energy  
18 Regulatory Commission, and is a full correct transcription  
19 of the proceedings.

20

21

22 Mike Williams

23 Official Reporter

24

25

# INDIVIDUALS

## IND1- JOHN ALLAIRE

Document Accession #: 20220412-5239

Filed Date: 04/12/2022

### Comments on AI Number 221642, Permit Numbers 0560-00997-V0 and PSD-LA-841, and Activity Numbers PER20210001 and PER20210002.

I am contesting approval of the aforementioned air permit application. I am a local property owner whose Cameron residence is located directly west of the proposed project site. All of my 311 acres of coastal wetlands are located within the Near Field Receptor area for air pollutants as detailed by Commonwealth in their air permit application. My residence and the sensitive surrounding coastal marsh habitat and wildlife will be directly affected by the continuous facilities noise, artificial lighting and air emissions.

In Commonwealth LNG's June 4, 2021 PSD air permit application they state that "The latest versions of AERMOD (AERMOD v19191) and its associated preprocessors will be used for the refined modeling compliance demonstration." for their proposed project location. Commonwealth LNG states that "Meteorological Data AERMOD requires observations of **representative** meteorological variables to calculate the ambient concentrations produced by sources of air pollutant emissions. These data include both surface and upper air meteorological observations. For the Commonwealth LNG Facility, the Lake Charles Regional Airport (WBAN 03937) was selected as the **representative site** for both the surface and upper air meteorological data. The Lake Charles Regional Airport is located approximately 41 km to the north of the Project site, lying just on the northern edge of the marshlands and within the coastal plain which are characteristic of the Project site, thus making it the most representative of the site conditions."

Air modeling conducted from a data source located 41kms from a pollutant source could not possibly provide accurate and reliable outputs, especially given the strong influence of the Gulf of Mexico creating a substantial difference in weather conditions between the proposed facility and Lake Charles. See Figure 1 below. I would comment that metrological data obtained from the Lake Charles Regional Airport is not the "most representative" of the surface observations necessary to perform accurate AERMOD at the proposed project site. There is a NOAA meteorological station located less than 750ms from the proposed project site. See Figure 2 below. The NOAA station records meteorological observations on 6 minute intervals and has years of historical data that is readily available on the NOAA website. If they wish to go forward with the permitting process at this location I would request that the Commonwealth LNG's modeling be revised to include local data that is truly representative of the proposed site conditions. Also this NOAA station will have the missing 2021 3<sup>rd</sup> Quarter data that was not captured at the Lake Charles Regional Airport.

I am sure that this oversight by the LADEQ and Commonwealth LNG with regard to local meteorological data availability was unintended. That being said, I am concerned about the potential for other oversights and errors in CWLNG's submittals to FERC, the State and other Federal agencies. For these and other previously stated reasons the CWLNG air permit should be denied.

Thank for your attention to my concerns.

John Allaire

621 Gulf Beach Hwy Holly Beach, Louisiana 70631

IND1-1 See response to comment PM8-1.

IND1-1

# INDIVIDUALS

## IND2- JOHN ALLAIRE

Document Accession #: 20220412-5240

Filed Date: 04/12/2022

Comments on Docket CP19-502-000, AI Number 221642, Permit Numbers 0560-00997-V0 and PSD-LA-841, and Activity Numbers PER20210001 and PER20210002, for Commonwealth LNG (CWLNG) Project

### Air and Noise Impacts EIR 8 and EIR 9

My name is John Allaire, 621 Gulf Beach Hwy, Holly Beach, LA. My property in Cameron Parish adjoins the western boundary of the proposed Commonwealth LNG export facility. I personally will be affected daily by the CW air emissions if this permit to operate is approved as presented. FERC in an Environmental Information Request 8 (EIR) submitted to CWLNG on September 20, 2021 and again on December 5, 2021 FERC requested that CWLNG respond to an EIR for information related to air pollutants. The agencies specifically requested that CWLNG provide isopleth maps which detailed "i.e. concentration plumes, showing the full range for all criteria pollutants that have maximum modeled concentrations that exceed the significant impact level (SIL) due to Project only Impacts;" As part of this request CWLNG was instructed to "ii. Ensure that the locations where the NAAQS are exceeded (due to cumulative impacts) are visually indicated in the figures.

CWLNG ignored the agencies first request for this information on September 2021 and in their December 15, 2021 response they failed to visually indicate the locations where NAAQS were exceeded due to cumulative impacts and from their direct project impacts. In Figure 1 of their December response they failed to visually indicate my residence which in previous submittals was identified as NSA3. See CW figures B2 and 1. Additionally, they did not include the communities of Cameron, Holly Beach or Johnson Bayou in any of their mapping.

In Figure 4 of this response CWLNG again failed to include NSA3 (my Residence) which appears to be surrounded by their 24-hour PM2.5 impact isopleth with no particulate matter being found on small sections of their eastern and western proposed site boundaries. I would request an explanation on how this is physically possible during calm weather conditions which can occur in this area at all times of the year and with an annually predominate SE wind? Could this be due to inaccurate air modeling found in their air permit application resulting from using metrological data obtained from the Lake Charles Airport located 41 KM from the project site. Prior to further DEQ review of this air permit application the DEQ should insist that CWLNG revise the air modeling using the local NOAA meteorological data. This NOAA Weather Station CAPL-8768094 weather station is located 750m from the proposed project site. Once this revised modeling data is presented to the DEQ and public for review a second public hearing should be held to review accurate revised air modeling emissions data.

In Figure 5 of this same response CWLNG again failed to include NSA3 or the local communities on their isopleths. The map clearly shows the increased 1 hour levels of NO2 in the Hackberry, LA area related to the Cameron LNG project. Amazingly, CWLNG's Figure 5 does not show any NO2 impacts on the Holly Beach area from the Venture Global LNG facility and their proposed facility. I would request an explanation on how this is possible. I think a complete and thorough review of revised air permit modeling data would be appropriate and necessary prior to approving any air permit for this facility.

In Figure 8 of this response CWLNG again failed to include NSA3 in their isopleth. If NSA3 is added to their isopleth my residence will clearly fall within the SIL zone. Based on the NO2 NAAQS exceedance locations they identify on Figure 5 in the Hackberry area I would request a review of their modeling as

IND2-1

IND2-1

The methods describing Commonwealth's modeling are provided in section 4.11.1.7. These methods follow EPA and LDEQ guidance. Tables 4.11.1-8 and 4.11.1-9 provide the modeling results for Project and background stationary and mobile sources including the distances from the Terminal in which significant impact level (SIL) values would be exceeded. Appendix H provides a tabular output of the model predictions for locations and distances from the Terminal in which EPA National Ambient Air Quality Standards (NAAQS) would be exceeded within a 50km range from the Project.

Document Accession #: 20220412-5240

Filed Date: 04/12/2022

the emissions from the existing Venture Global LNG facility and the proposed CWLNG facility do not seem to appear to increase NO2 levels in the local area.

IND2-1

I have included the aforementioned modified figures to reflect the locations of my residence and Holly Beach and recent flaring photo from the Venture Global LNG Facility taken in April 2022.

IND2-2

If FERC and the LAEQ cannot assure the acceptable pollution levels at NSA3 and the local communities from site construction, flaring and daily operations I request that the CWLNG permits not be granted.

IND2-2

Comment noted.

# INDIVIDUALS

## IND2- JOHN ALLAIRE

Document Accession #: 20220412-5240

Filed Date: 04/12/2022



Environmental Noise  
Assessment  
Commonwealth LNG

Hoover & Keith Inc.  
Report 4033, Revision 5  
Page 19 of 31



Figure B2: Normal Full Load Operation Ldn 55 Sound Contour

Appendix B: Figures

## INDIVIDUALS

### IND2- JOHN ALLAIRE

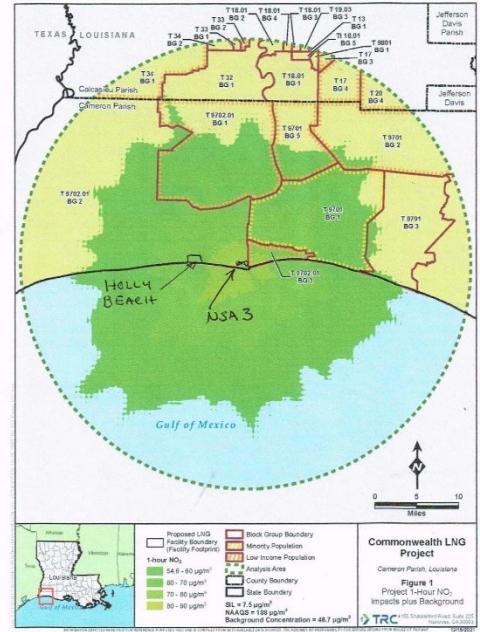
Document Accession #: 20220412-5240

Filed Date: 04/12/202

Commonwealth LNG Project  
FERC Docket No. CP19-502-000

Submitted to FERC on December 15, 2021

TABLE 14804 14805



# INDIVIDUALS

## IND2- JOHN ALLAIRE

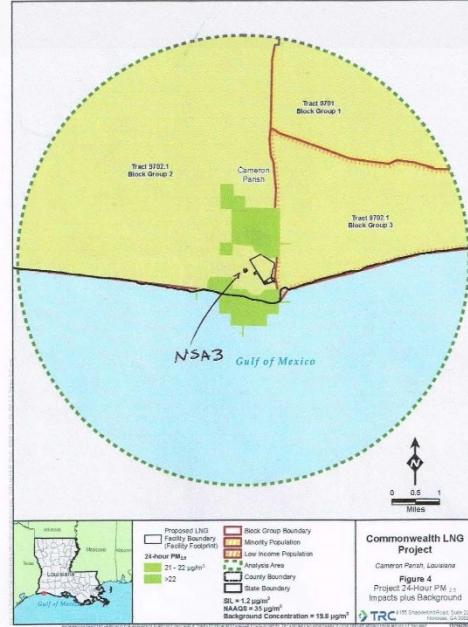
Document Accession #: 20220412-5240

Filed Date: 04/12/2022

Commonwealth LNG Project  
FERC Docket No. CP19-502-000

Response to Environmental Information Request  
Dated December 6, 2021

Submitted to FERC on December 15, 2021



## INDIVIDUALS

### IND2- JOHN ALLAIRE

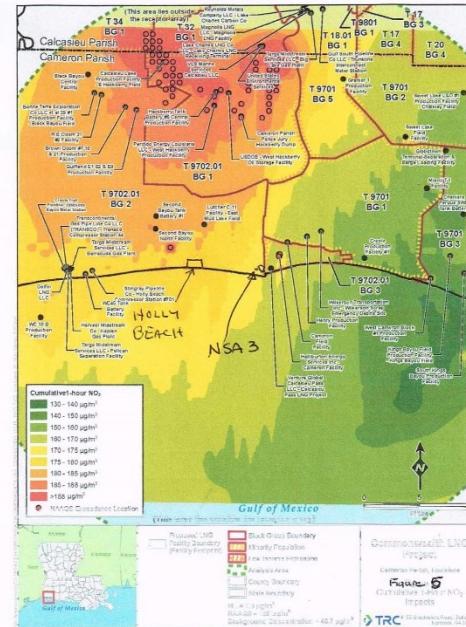
Document Accession #: 20220412-5240

Filed Date: 04/12/2022

Commonwealth LNG Project  
FERC Docket No. CP19-502-000

Response to Environmental Information Request  
Dated December 6, 2021

Submitted to FERC on December 15, 2021



## Figure

# INDIVIDUALS

## IND2- JOHN ALLAIRE

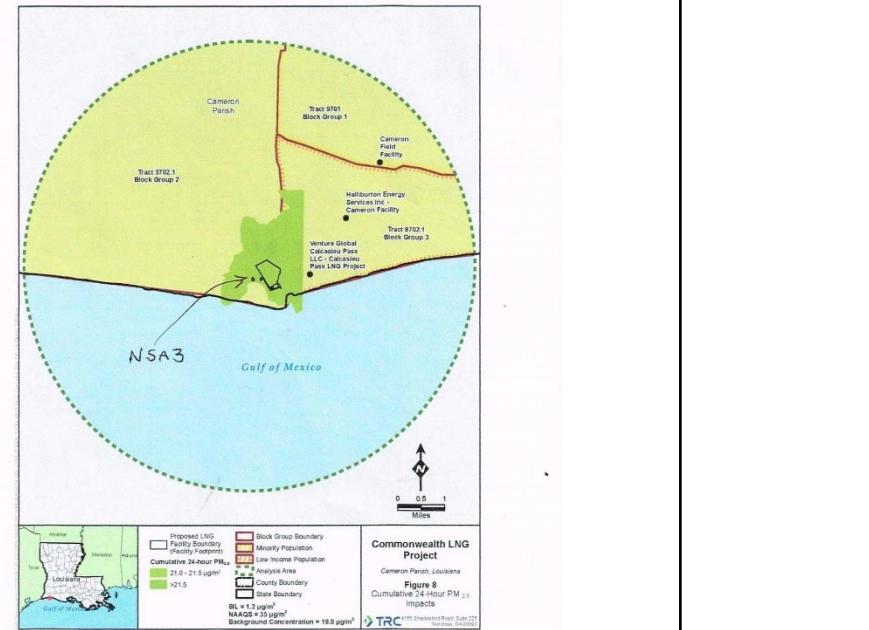
Document Accession #: 20220412-5240

Filed Date: 04/12/2022

Commonwealth LNG Project  
FERC Docket No. CP19-502-000

Response to Environmental Information Request  
Dated December 6, 2021

Submitted to FERC on December 15, 2021



# INDIVIDUALS

## IND2- JOHN ALLAIRE

Document Accession #: 20220412-5240

Filed Date: 04/12/2022

Venture Global 4-9-2022 4:17pm



# INDIVIDUALS

## IND3- JOHN ALLAIRE

Document Accession #: 20220412-5241

Filed Date: 04/12/2022

AI Number 221642, Permit Numbers 0560-00997-V0 and PSD-LA-841, and Activity Numbers PER20210001 and PER20210002, for Docket CP19-502-000 Commonwealth LNG (CWLNG) Project

I am a local property owner whose secondary residence is located directly west of the proposed project site. All of my 311 acres of coastal wetlands are located within the Near Field Receptor area for air pollutants as detailed by Commonwealth in their air permit application. I and the sensitive surrounding coastal Chenier and marsh habitat and associated wildlife will be directly affected by the continuous facilities noise, artificial lighting and air emissions. I am contesting approval of the aforementioned air permit application.

In Commonwealth LNG's September 15, 2021 Response to Environmental Information Request they state that "The LDEQ Air Modeling Procedures document specifically identified the Lake Charles Regional Airport as the primary meteorological data source for Southwest LA. "

Section 5.2.2. of the LDEQ Air Modeling Procedure document also states that the LDEQ will "determine the appropriate meteorological stations for a facility on a "case by case" basis." This LDEQ document goes on to state that "a list of potential surface stations may be determined from <http://www.ncdc.noaa.gov/oa/climate/stationlocator.html>." In section 5.2.4. of the LDEQ document they state "EPA considers on-site surface meteorological data to better reflect actual conditions at the facility". The NOAA climate locator clearly identifies the NOAA Weather Station CAPL-8768094, located 750meters (less than a half mile) from the site, as a representative source for accurate meteorological data for air dispersion modeling.

Air modeling conducted from a data source located 41kilometers (more than 22 miles) from a pollutant source could not possibly provide accurate and reliable model outputs for their current air permit application. The strong influence of the Gulf of Mexico creates a substantial difference in meteorological conditions between the proposed facility and Lake Charles Regional Airport.

As the LDEQ is tasked with determining the appropriate the meteorological station to obtain data on a case by case basis. I would respectfully request that approval of the current air permit application be denied until truly representative air and noise modeling has been conducted and included in a revised air permit application. Please inform me of you decision with regard to these comments at the address below.

Thank for your attention to this matter.

John Allaire

621 Gulf Beach Hwy

Holly Beach, Louisiana

70631

IND3-1 See the response to comment PM8-1.

IND3-1

# INDIVIDUALS

## IND4- JOHN ALLAIRE

Document Accession #: 20220412-5242

Filed Date: 04/12/2022

AI Number 221642, Permit Numbers 0560-00997-V0 and PSD-LA-841, and Activity Numbers PER20210001 and PER20210002, for Commonwealth LNG Project, Docket CP19-502-000,

Contesting Permit Application Due to Air and Noise Impacts at NSA3

In CWLNG's 2019 Air and Noise Assessment, Revision 2, Resource Report 9, Figure D-2 they clearly indicated that my residence was located within the Ldn 55 foot print. Thank you to the agencies for recognizing my residence as NSA3. In CWLNG's 2021 Air and Noise Assessment Revision 5 they submitted a revised Figure B2 which magically compressed the western portion of their Ldn 55 sound contour to include only the eastern portion of my residence. See figure D2 and B2 below. As stated in their 2019 report the operational noise impact from normal full load facility operation will clearly exceed the Ldn 55b sound level at NSA3.

In an Environmental Information Request to CWLNG dated December 6, 2021 the agencies requested the following. "Given the proximity to NSA3 of the normal load operation day/night sound level (Ldn) in Commonwealth's noise modeling (Figure B2 in CWLNG's ENA)." They were asked to "provide sound mitigation techniques or operations modifications that CW would implement to ensure noise levels are below Ldn of 55 decibels on the A-weighted scale at the NSA3." The mitigation measures that CWLNG are proposing are the standard minimum noise mitigation measures used to reduce onsite noise levels that facility operations personnel are exposed too. I am concerned that the proposed mitigation measures will not be effective in sufficiently reducing the noise levels below Ldn of 55 at NSA3. Will CWLNG shutdown operations until additional sound mitigation techniques or operational modifications are implemented to achieve acceptable noise levels at NSA3. If these additional mitigation measures are not effective in reducing the noise levels at NSA3 below Ldn of 55 decibels will they be permitted to operate while exceeding required noise levels.

The CWLNG proposed three flare location are 800' from my property boundary and 1700' from my residence. I have personally conducted numerous noise surveys in a major gulf coast refinery and know that flare noise levels can easily exceed 140 dBs. CWLNG has to date failed to provide confirmation in the ENA with regard to the anticipated noise levels from their flare operations at my residence, property boundary or the surrounding environmentally sensitive marshlands. CWLNG has stated that the flares will only be used during start-up and emergency operations. I have been observing the Venture Global Calcasieu Pass LNG Export facility loading of the LNG tanker Yiannis which began on February 7, 2022. Venture Global flared continuously for a period of 21 days during the Yiannis loading process. I have daily videos and photos to document this observation. I have included a few representative photos below. Venture Global has continued to flare 24 hours a day 7 days a week as of this writing on April 9, 2022. Additional flaring documentation can be provided upon request. Will this be representative of CWLNG's vessel loading and operating procedures? I am reiterating my request that the CWLNG ENA be revised to include the noise levels at NSA3 related to operation of their flare systems. If CWLNG and the LAEQ cannot assure the required acceptable noise levels at NSA3 from site construction, flaring and daily operations I request that the air permits not be granted and the site seek an alternative location for their project.

John Allaire 621 Gulf Beach HWY Holly Beach, Louisiana 70631

IND4-1 Noise impacts on NSAs and FERC's associated conditions are discussed in section 4.11.2.4 and 5.2.

IND4-2 Comment noted. Commonwealth's air permit application with LDEQ is described in section 4.11.1.7. Air quality and noise impacts are described in sections 4.11.1 and 4.11.2. Section 4.11.2 updates Commonwealth's anticipated flaring duration. Additionally, the design of the Calcasieu Pass LNG project is substantially different what is proposed by Commonwealth; therefore, the expected flaring durations of the two facilities cannot be compared directly.

IND4-1

IND4-2

# INDIVIDUALS

## IND4- JOHN ALLAIRE

Document Accession #: 20220412-5242

Filed Date: 04/12/2022

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	Environmental Noise Assessment	Hoover & Keith Inc. Report 4033, Revision 2
	Commonwealth LNG	Page 17 of 21

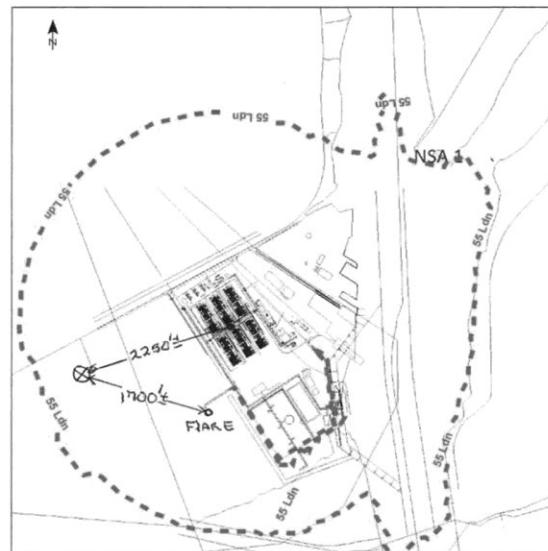


Figure D2: Normal Full Load Operation Ldn 55 Sound Contour

⊗ SECONDARY Residence  
OF JOHN ALLAIRE

Appendix D: Figures

# INDIVIDUALS

## IND4- JOHN ALLAIRE

Document Accession #: 20220412-5242

Filed Date: 04/12/2022

	Environmental Noise Assessment	Hoover & Keith Inc. Report 4033, Revision 5
Commonwealth LNG	Page 19 of 31	



Figure B2: Normal Full Load Operation Ldn 55 Sound Contour

Appendix B: Figures

# INDIVIDUALS

## IND4- JOHN ALLAIRE

Document Accession #: 20220412-5242      Filed Date: 04/12/2022



Yiannis Loading at Venture Global Cameron 2-7-2022

# INDIVIDUALS

## IND4- JOHN ALLAIRE

Document Accession #: 20220412-5242      Filed Date: 04/12/2022



Yiannis Loading 2-15-22

# INDIVIDUALS

## IND4- JOHN ALLAIRE

Document Accession #: 20220412-5242      Filed Date: 04/12/2022



Yiannis loading 2-23-2022

# INDIVIDUALS

## IND4- JOHN ALLAIRE

Document Accession #: 20220412-5242

Filed Date: 04/12/2022



Yiannis Loading 2-27-2022

# INDIVIDUALS

## IND4- JOHN ALLAIRE

Document Accession #: 20220412-5242      Filed Date: 04/12/2022



Venture Global 4-6-22 Flaring

# INDIVIDUALS

## IND5- JOHN ALLAIRE

Document Accession #: 20220511-5089

Filed Date: 05/11/2022

Comments on Docket CP19-502-000 to FERC in response to Draft EIS Report (DEIS) Dated March 31, 2022. Comments with regard to drainage and tidally influenced areas affected by this project.

I am a local property owner whose residence is located directly west of the proposed project site. All of my 311 acres of coastal wetlands drain through main footprint of the proposed CWLNG site. I am a degreed professional with over thirty of experience in the environmental field. I have worked as an Environmental Engineer, Environmental Coordinator and an Environmental Manager for one of the world's largest Oil and Gas companies in the world. Over twenty years of career were spent working in Louisiana. My credentials are available upon request. Much of my property is tidally influenced and will be directly affected by the proposed project. I have been living at this site since 1998 and have observed the tidal action in this area for 24 years. The current mapping of area drainage plan and tidally influenced areas as presented in the DEIS are incomplete and inaccurate.

FERC has failed to include the following in their construction and operations facilities list. Accurate details related to the External Stormwater Culvert issue. This External Stormwater Culvert is detailed on many of the CWLNG project figures and engineering drawings. CWLNG plans to construct a massive external Stormwater Culvert drainage system. On March 15, 2022, in a letter to TRC Environmental and CWLNG the Louisiana Office of Coastal Management stated the following. "After careful review of your permit application for a Coastal Use Permit we have determined that they were unable to continue processing of the application until we receive the following information." "On 3/13/2022 OCM received an objection to the proposed project from an adjacent landowner. The primary concern appears to be related to drainage from his property to the Calcasieu Ship Channel. Please review his concerns (which I emailed directly to Keith Suderman and Jim Leblanc) and provide a response addressing the adjacent landowner's concerns." See accompanying letter of correspondence between LA OCM and CWLNG. Processing of the CWLNG Coastal Use Permit was suspended due to lack of specificity with regard to drainage issues related to this project. The DEIS includes no information on how this issue will be resolved and is thus incomplete.

With regard to delineation of tidally influenced areas affected by this project FERC in a March 31, 2022 letter to NOAA NMFS the USACE stated the following "As of March 31, 2022, the U.S. Army Corps of Engineers had not completed its official accounting of the acreage of wetlands that it considers to be tidally influenced at the LNG terminal site; therefore, the final acreage total of EFH that would be affected by construction of the Project could vary from that presented here." See footnote 2 in the second attachment. The DEIS presents "no official accounting of the acreage of wetlands that it considers to be tidally influenced at the LNG terminal site." I contend that the amount of tidally influenced wetlands as currently presented in the DEIS is inaccurate and greatly underreported. In this DEIS the agencies have failed to disclose the extent of the tidally affected wetlands or the how the adjacent area drainage will not be disrupted. How can the public be expected to respond intelligently to the project's environmental affects if this information is not disclosed. I respectfully request at a minimum that FERC formally withdraw this incomplete DEIS until they can provide the public with complete and accurate information related to this project. If these issues cannot be resolved I would respectfully request that the appropriate agencies deny the permits needed to proceed with this project at this environmentally productive and sensitive area. Thank for your attention to this matter.

John Allaire BS/MS Physical Sciences

IND5-1 The external stormwater culvert referenced in the comment is indicated in figure 2.1-1 and is described in section 2.1.1.5. As described in section 4.4.1.1, Commonwealth proposes to consult agencies such as OCM and NMFS for the design of the stormwater culvert to ensure it would be constructed to maintain hydrological flow from the wetlands west of the Terminal site to the Calcasieu River.

IND5-2 Updated Project impacts on wetlands and Commonwealth's proposed mitigation are provided in section 4.4.2.

IND5-1

IND5-2

# INDIVIDUALS

## IND5- JOHN ALLAIRE

Document Accession #: 20220511-5089

Filed Date: 05/11/2022

**JOHN BEL EDWARDS**  
GOVERNOR



**THOMAS F. HARRIS**  
SECRETARY

### State of Louisiana DEPARTMENT OF NATURAL RESOURCES OFFICE OF COASTAL MANAGEMENT

03/15/2022

TRC ENVIRONMENTAL  
8550 UNITED PLAZA BLVD SUITE 502  
BATON ROUGE, LA 70809  
Attn: Jim Leblanc

**RE: P20190900, Coastal Use Permit Application  
COMMONWEALTH LNG LLC**

**Description:** Proposed construction of a natural gas liquefaction and export facility (LNG), which includes a 15,769 linear feet long, 42-inch diameter natural gas pipeline, six gas liquefaction processing units, six LNG storage tanks and one marine loading berth (see Support Docs online OCM website for additional details). Approx. 1,432,900 cy will be brought on site, 2,522,000 cy will be excavated and placed onsite, and 90,000 cy will be excavated and hauled offsite.

**Location:** Lat 29-46-13.84 N / Long -93-21-9.83 W (see project drawings for all project site coordinates); 500 Gulf Beach Highway, Cameron.

**Cameron Parish, LA**

Dear Jim Leblanc:

[REDACTED]

#### Project Specific Requirements

On 3/13/2022 OCM received an objection to the proposed project from an adjacent landowner. The primary concern appears to be related to drainage from his property to the Calcasieu Ship Channel. Please review his concerns (which I emailed directly to Keith Suderman and Jim Leblanc) and provide a response addressing the adjacent landowner's concerns.

This information is being requested pursuant to the Louisiana Administrative Code, Title 43, Part I, Chapter 7, § 723.c.7 and must be submitted within 30 days of the date of this letter. In accordance

# INDIVIDUALS

## IND5- JOHN ALLAIRE

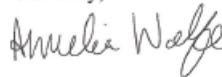
Document Accession #: 20220511-5089      Filed Date: 05/11/2022

P20190900, Coastal Use Permit Application  
COMMONWEALTH LNG LLC  
(3/15/2022  
Page 2

with the Rules and Procedures for Coastal Use Permits, Part III G(1), we will resume processing your application when the above information is received. Further information may be required based, on your answers to the above questions or to questions which may arise during processing.

Please refer to the above Coastal Use Permit number when responding to this request. If you have any questions, call me at (225) 342-0566.

Sincerely,



Amelia Wolfe  
Permit Analyst

AW

cc: Martin Mayer, COE w/attachment  
COMMONWEALTH LNG LLC

# INDIVIDUALS

## IND5- JOHN ALLAIRE

Document Accession #: 20220511-5089

Filed Date: 05/11/2022

FEDERAL ENERGY REGULATORY COMMISSION  
888 First Street, NE  
WASHINGTON, D.C. 20428

OFFICE OF ENERGY PROJECTS

In Reply Refer To:  
OEP/DG2E/Gas 4  
Commonwealth LNG, LLC  
Commonwealth LNG Project  
Docket Nos. CP19-502-000 and  
CP19-502-001

March 31, 2022

VIA Electronic Mail

Rusty Swafford  
Acting Assistant Regional Administrator  
National Marine Fisheries Service  
Habitat Conservation Division, Southeast Region  
[rusty.swafford@noaa.gov](mailto:rusty.swafford@noaa.gov)

**RE: Commonwealth LNG Project – Essential Fish Habitat Assessment**

Dear Mr. Swafford:

Commonwealth LNG, LLC (Commonwealth) filed an application with the Federal Energy Regulatory Commission (FERC) for authorization to construct, own, and operate the Commonwealth LNG Project (Project). Commonwealth requests authorization pursuant to section 3(a) of the Natural Gas Act (NGA) to construct, operate, and maintain a liquefied natural gas (LNG) export Terminal and natural gas pipeline system in Cameron Parish, Louisiana. The staff of the FERC issued a draft environmental impact statement (EIS) for the Project on March 31, 2022. As required by the Magnuson-Stevens Fishery Conservation and Management Act, and as described in the EIS, I am requesting an essential fish habitat (EFH) consultation with your office for the Project.

Commonwealth proposes to construct the following facilities as part of the proposed Project:

- six liquefaction trains at the Commonwealth LNG Terminal, each with a nominal capacity of 1.4 million tons per annum of LNG for export, resulting in the total nominal capacity of 8.4 million tons per annum;

# INDIVIDUALS

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- six LNG storage tanks, each with a net capacity of 50,000 cubic meters;
- a new marine facility with one LNG vessel berth to accommodate loading of LNG vessels with capacities ranging from 10,000 to 216,000 cubic meters, an LNG vessel and support vessel maneuvering area, and an overwater barge dock;
- an approximately 2,500-foot-long earthen stormwater culvert along the west and south sides of the Terminal perimeter to convey stormwater and drainage from the wetlands west of the Terminal to the Calcasieu River;
- two flare systems;
- utilities (e.g., electricity generation, water, plant air, nitrogen, hot oil system);
- operation and safety systems (e.g., access and haul roads, storm protection structures, stormwater drainage systems, spill containment system, fire suppression facilities, facility lighting and security, emergency shutdown systems);
- appurtenant facilities (e.g., administrative facilities, maintenance and warehouse buildings, marine facility operator buildings, equipment enclosures and electrical rooms); and
- 3.0 miles of 42-inch-diameter pipeline, including two interconnection facilities, one metering station, and one pig<sup>1</sup> launcher facility;

Please refer to the EIS for maps and other Project-specific information.

The proposed Project would require dredging and in-water pile driving to construct the LNG vessel berth and biennial dredging to maintain the depth of the vessel berth. Construction of the LNG terminal would permanently fill 11.9 acres of tidally influenced emergent wetlands,<sup>2</sup> 1.6 acres of tidal slough habitat, and 1.2 acres of open water; and construction of the pipeline would temporarily affect about 43.6 acres of tidally influenced emergent wetlands along the 3.0-mile right-of-way and

<sup>1</sup> A “pig” is a device that travels within a pipeline and is used to clean and dry the pipeline and/or to inspect it for damage or corrosion

<sup>2</sup> [REDACTED]

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permanently fill 0.3 acre of tidally influenced emergent wetlands to construct the aboveground facilities. Essential Fish Habitat for post larval and juvenile stages of white shrimp, brown shrimp, red drum, red snapper, gray snapper, lane snapper, gray triggerfish, cobia, greater amberjack, king mackerel, Spanish mackerel, scalloped hammerhead shark, blacktip shark, and Atlantic sharpnose shark occurs in the Project area. We request that NMFS consider the draft EIS (section 4.6.3) as our initiation of EFH consultation. We will update our EFH assessment and consultation with NMFS, if necessary, as we receive additional Project information from Commonwealth.

We request any potential recommendations you may have for EFH conservation measures and request your ultimate concurrence with our assessment. If you have any questions or concerns regarding this request, please contact Nancy Fox-Fernandez, environmental project manager, at (202) 502-8559.

Sincerely,



Danny Laffoon,  
Chief, Gas Branch 1  
Division of Gas – Environment  
and Engineering

Cc: VIA Electronic Mail

January Murray  
NOAA Fisheries  
National Oceanic and Atmospheric Administration  
Habitat Conservation Division  
[January.Murray@noaa.gov](mailto:January.Murray@noaa.gov)

# INDIVIDUALS

## IND6- JOHN ALLAIRE

Document Accession #: 20220517-5047

Filed Date: 05/17/2022

### Comments on Docket CP19-502-000 to FERC in response to Draft EIS Report (DEIS) Dated March 31, 2022. Comments with Regard to the Proposed CWLNG Marine Berth Assessment

I am a local property owner whose residence is located directly west of the proposed project site. All of my 311 acres of coastal wetlands adjoin Section 28 of the proposed CWLNG site. I am a degreed professional with over thirty of experience in the environmental field. I have worked as an Environmental Engineer, Environmental Coordinator and an Environmental Manager for one of the world's largest Oil and Gas companies in the world. Over 40 years of my career were spent working in Texas and Louisiana drilling for, producing and refining oil and gas reserves for consumption by US consumers, manufacturers and industries. My credentials are available upon request.

The DEIS Introduction makes the following statement under the Aquatic Resources heading. "Construction of the Terminal's marine facility would require dredging/excavation of 55.0 acres (mostly in tidal estuarine habitat) and driving concrete and steel pilings in water with vibratory and impact pile drivers. Potential impacts from these activities include increased sedimentation, turbidity, and noise levels, which could adversely affect aquatic resources. The aquatic species within the Project area are accustomed to regular fluctuations in turbidity levels from industrial activity and strong tidal currents within the Calcasieu Ship Channel. Commonwealth would use a hydraulic dredge with a suction cutter head, which would minimize the resuspension of sediments and associated turbidity during dredging. Further, the soft, unconsolidated sediments in the Project area experience frequent cycles of tidal-related scour and deposition, which favors organisms that are adapted to a frequently changing substrate environment. These organisms would therefore recover quickly after construction. We conclude that sedimentation and turbidity impacts on aquatic resources from dredging would be localized, temporary to short-term, and not significant."

The reporting by CWLNG to the agencies that the existing sediments in the project area are soft and unconsolidated, is a frequently changing substrate environment and resident organisms would recover quickly after construction of the marine berth are incorrect. It is clear that a comprehensive evaluation of this area was never conducted or incorrectly reported to the agencies. As a degreed geologist I can state that the sediments in this area are neither soft nor unconsolidated. Smaller rocks that have washed off west jetty since its construction which began in 1896 and the influx of sediments that drain into this area from the west have allowed the sediments in this flat to stabilize and provide a unique habitat that supports oysters, barnacles, mussels and a wide variety of crabs and small bait fish. See map below for the North and South oyster reef locations. North oyster reef coordinates follows; 29 46'05.80"N, 93-20'52.05W. South oyster reef coordinates are 29 46'01.19"W, 93 20'50.89W.

The statement that these sediments experience frequent cycles of tidal-related scour and deposition is also incorrect. While this area does experience frequent cycles of tidal-related events no scouring or redisposition of sediments occurs at this location during normal tidal events. See the attached historical photographs and videos of the consolidated sediments and oyster reefs in the CWLNG proposed marine berth location. It is clear that a comprehensive evaluation of this area was never conducted by CWLNG.

It would be impossible for these shallow water organisms to recover quickly and not be significantly impacted in a 40' deep ship berth that will undergo periodic maintenance dredging. I have been wade fishing the described area for 24 years with family and friends. This is one of the few stable hard bottom flats on the entire western shoreline of the Calcasieu River. This site is a prized location for the local fishing guides to bring their clients. A survey of the areas local fishing guides will confirm my observations and statements.

IND6-1

Section 4.4.1.1 provides an updated description of the area referred to in the comment, which the COE characterizes as a "special aquatic site". Sections 4.6.2 and 4.6.3 describe the aquatic habitats and species present in this area, including estuarine oyster reef habitat.

IND6-2

See response to IND6-1.

IND6-1

IND6-2

# INDIVIDUALS

## IND6- JOHN ALLAIRE

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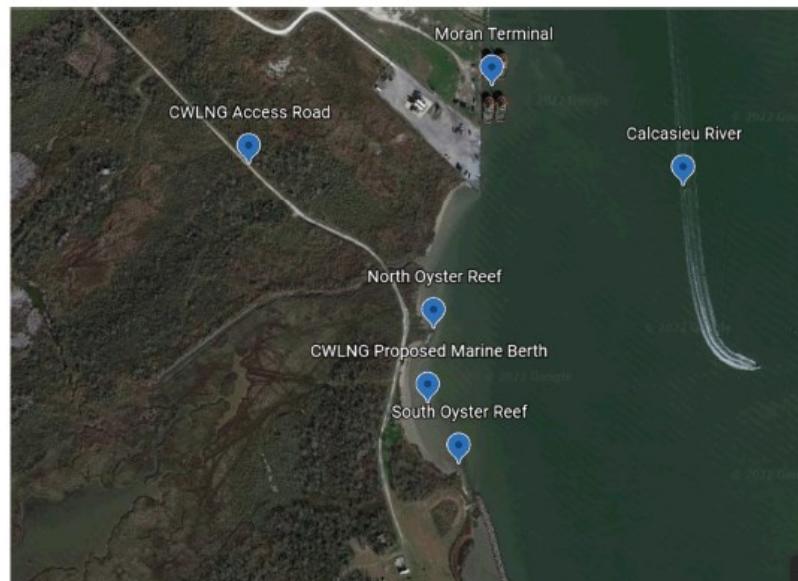
How can the public be expected to respond intelligently to the project's environmental affects if incorrect information is found in the DEIS. I respectfully request at a minimum that FERC formally withdraw this DEIS until they can provide the public with complete and accurate information related to this project. If these issues cannot be investigated and resolved I would respectfully request that the Under the No-Action Alternative, the Project should not be permitted at this environmentally productive and sensitive area.

Thank for your attention to this matter.

IND6-3

IND6-3      Comment noted.

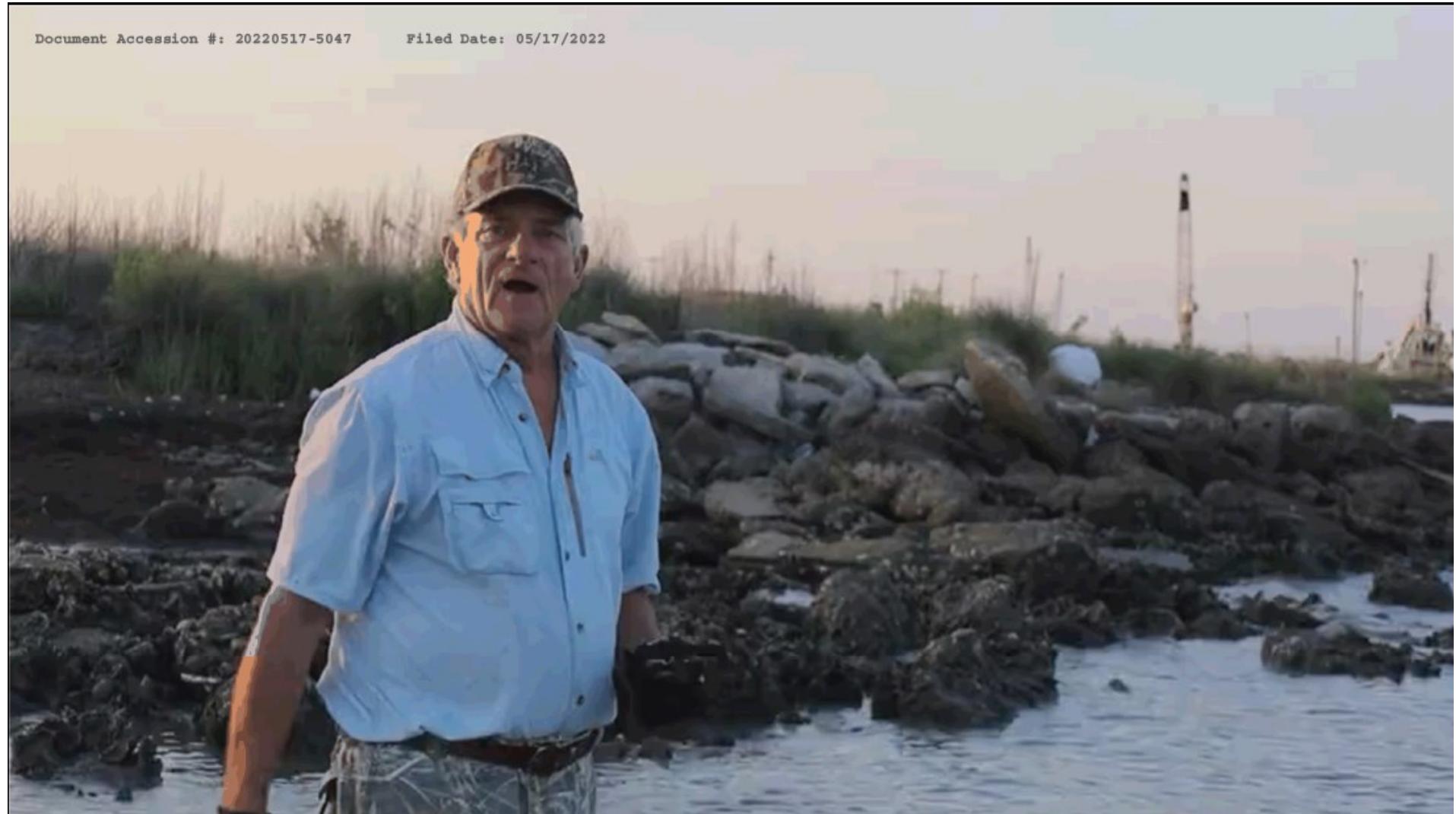
John Allaire BS/MS



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**IND6- JOHN ALLAIRE**

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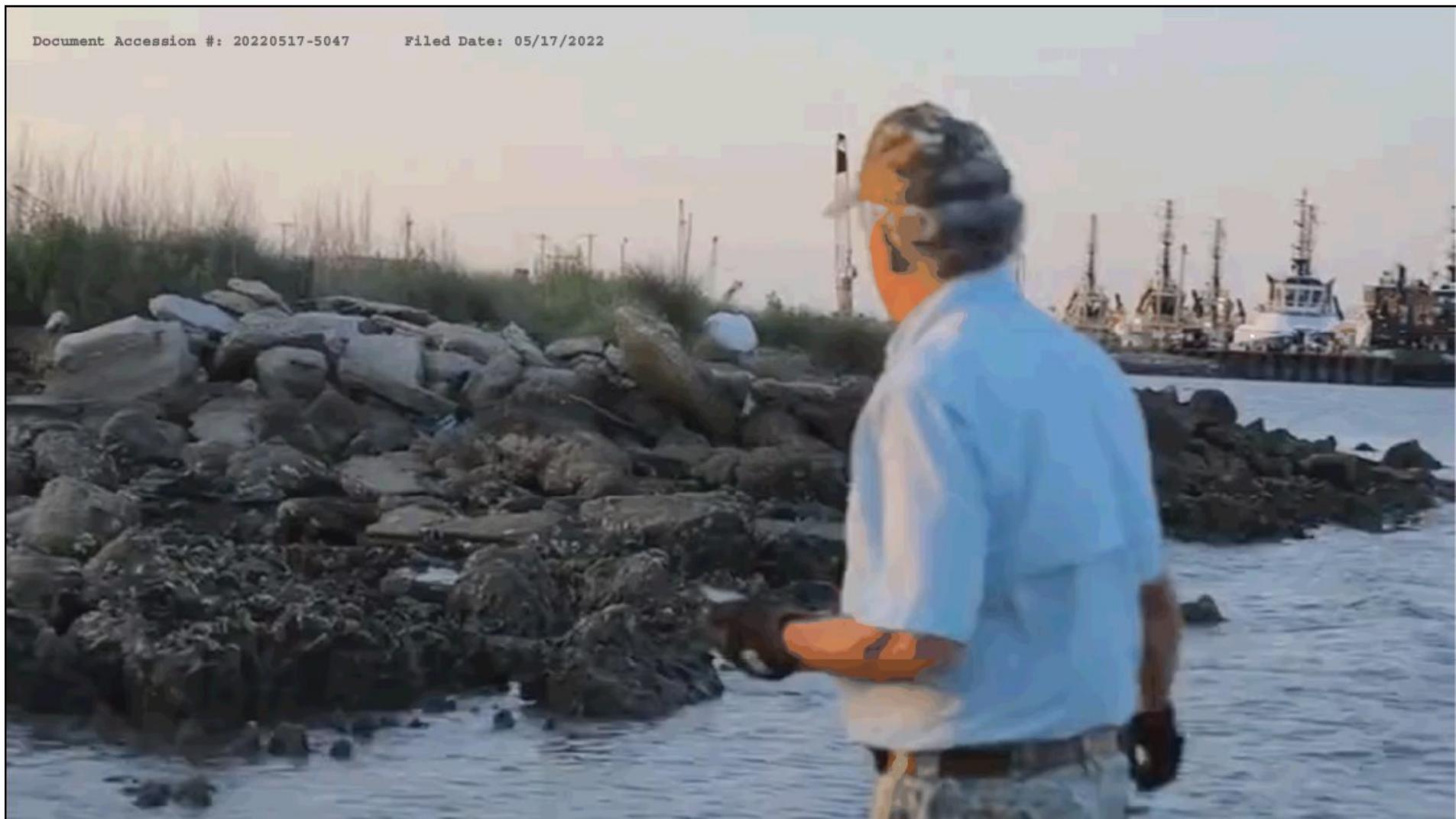
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Filed Date: 05/17/2022

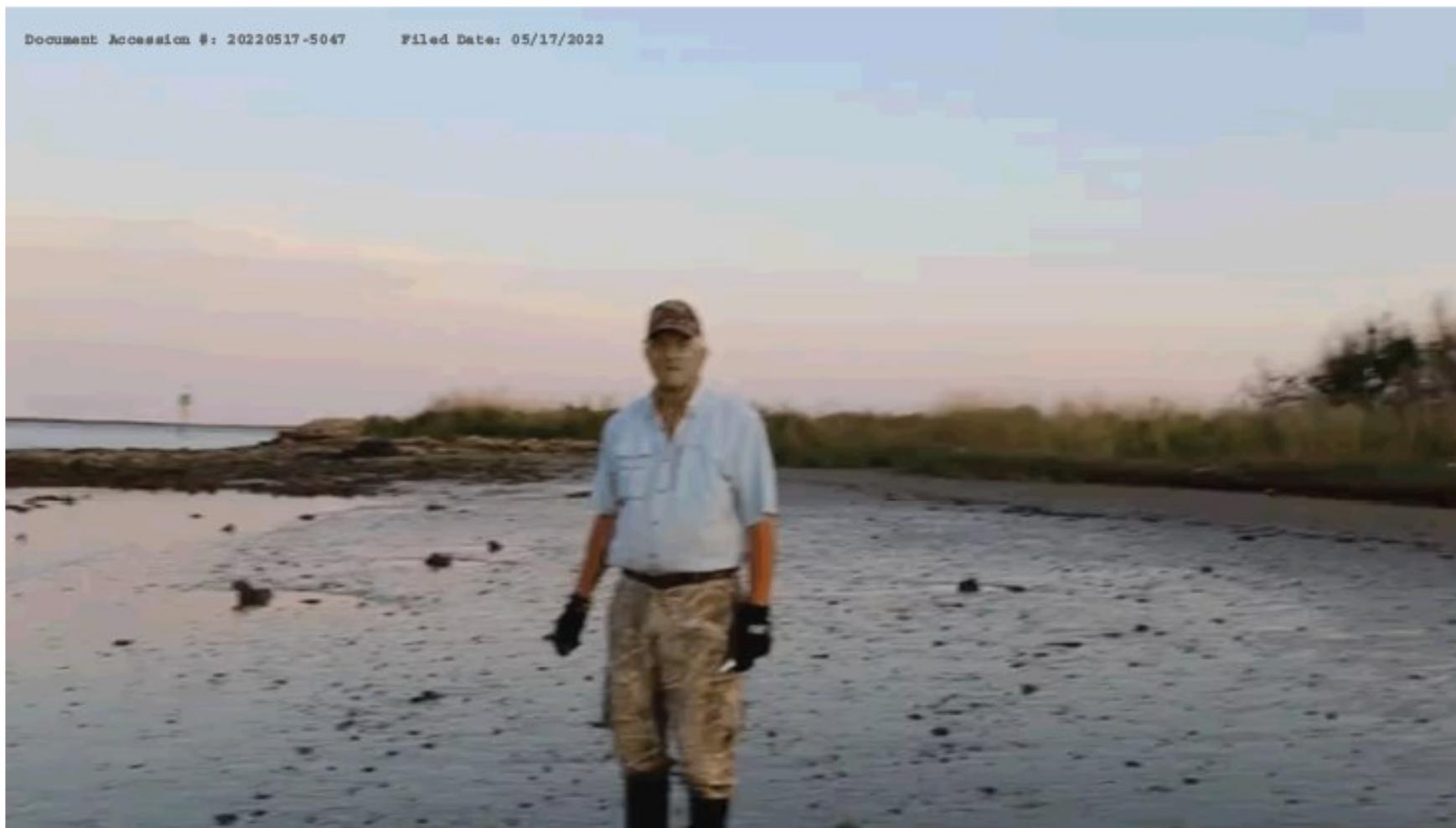


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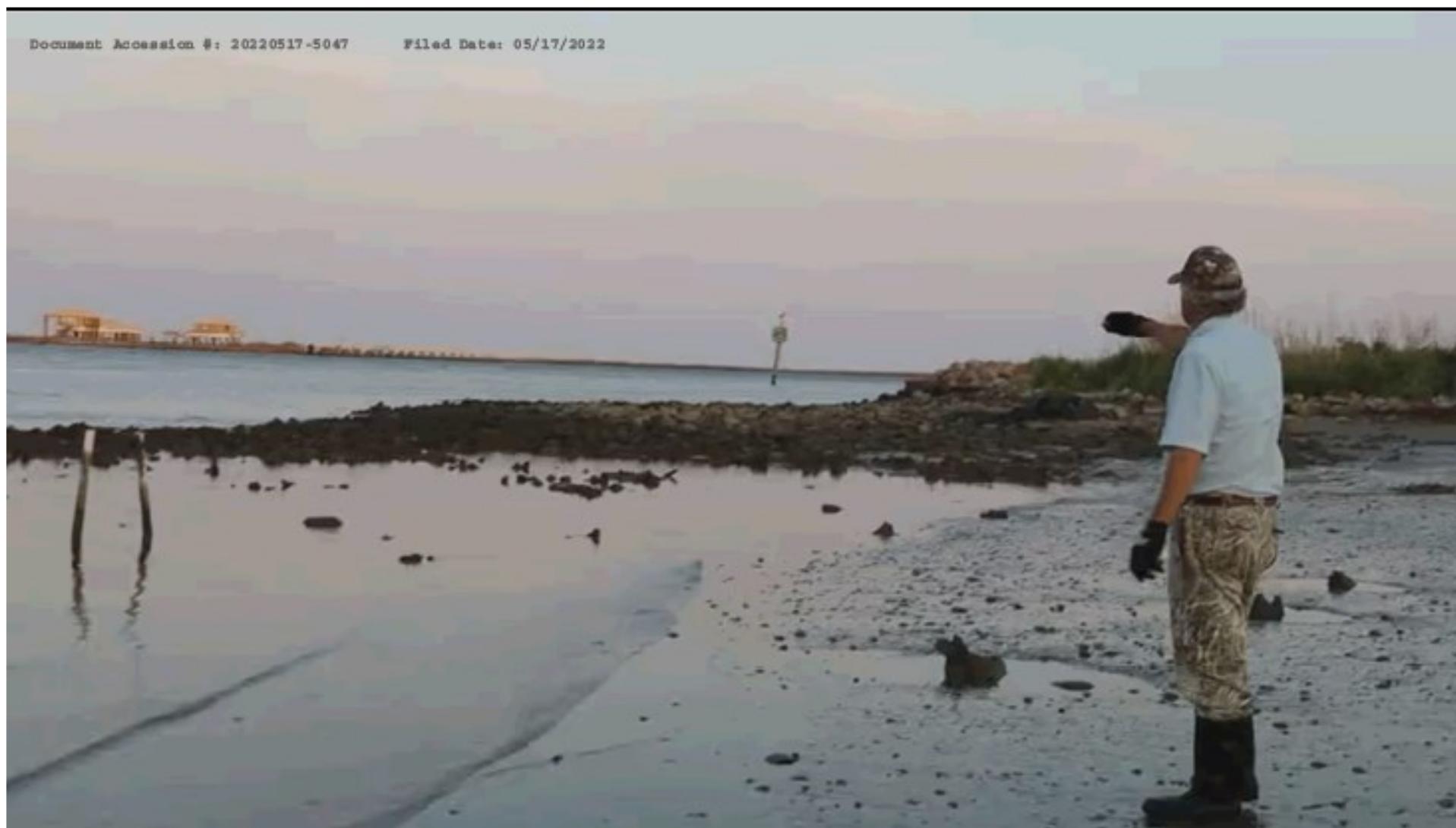
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Filed Date: 05/17/2022

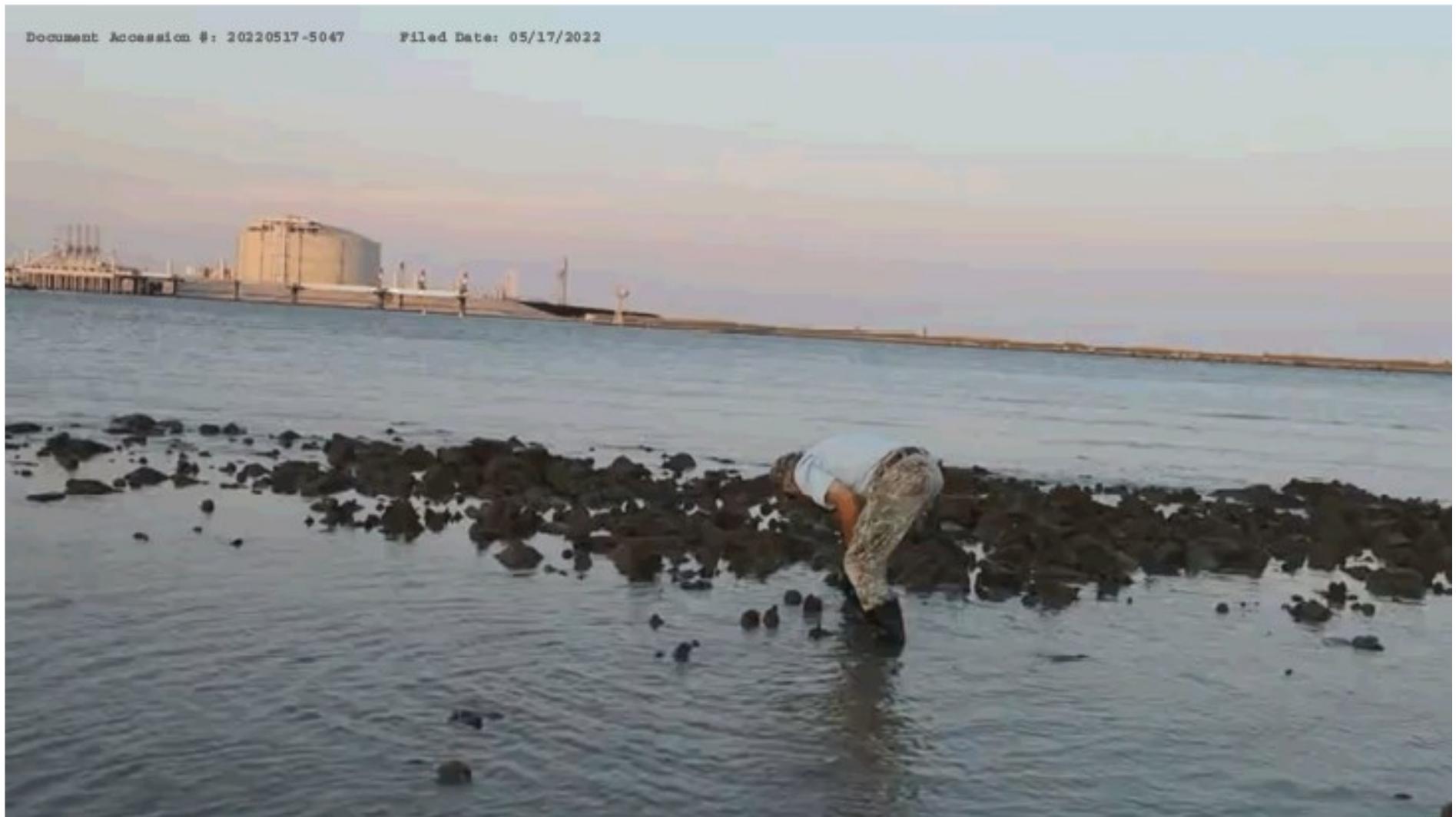


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# INDIVIDUALS

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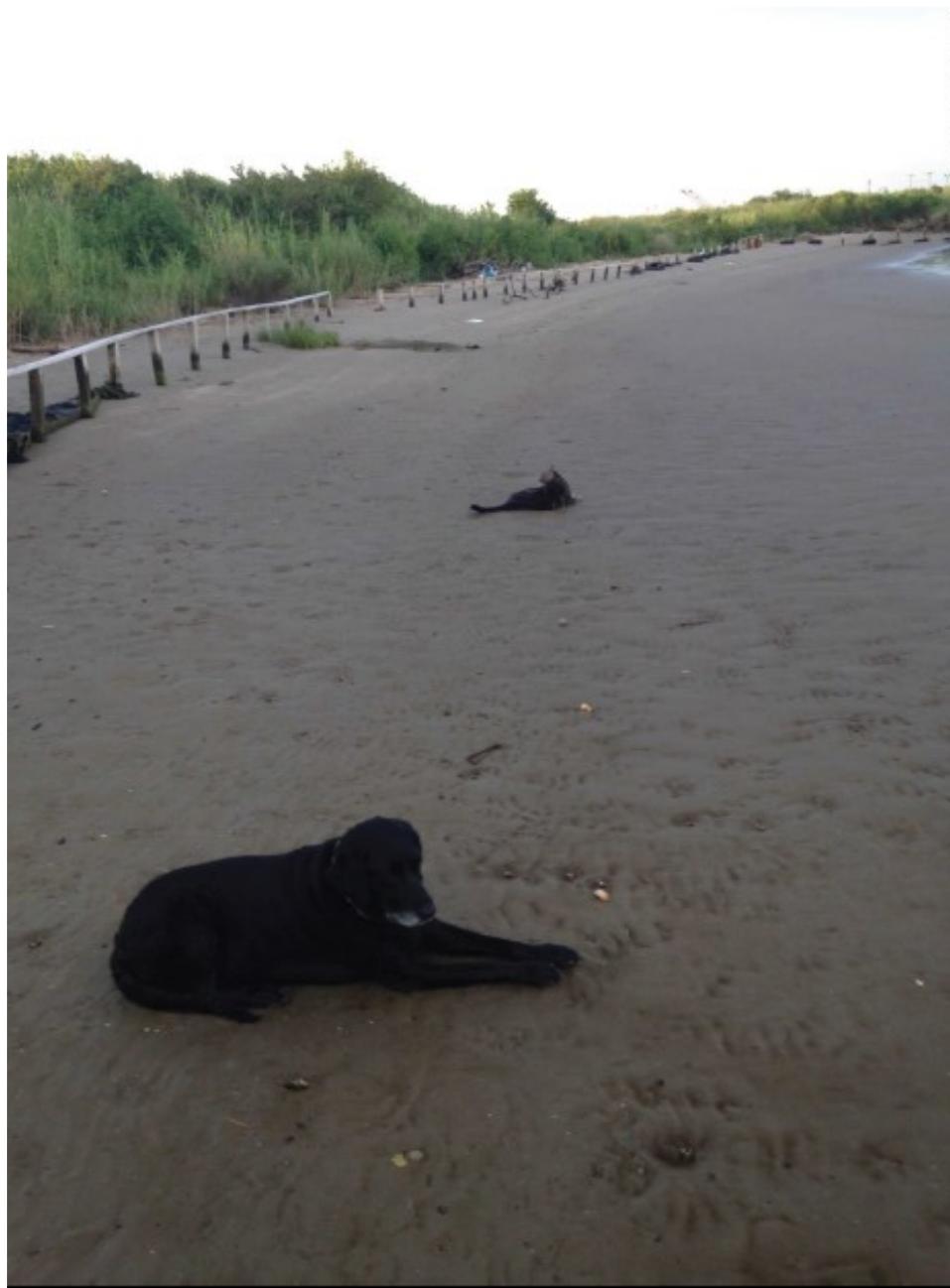


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Individual Comments

# INDIVIDUALS

## IND6- JOHN ALLAIRE



# INDIVIDUALS

## IND6- JOHN ALLAIRE



**INDIVIDUALS**  
**IND6- JOHN ALLAIRE**



# INDIVIDUALS

## IND7- JOHN ALLAIRE

### Comments on Docket CP19-502-000 to FERC in response to Draft EIS Report (DEIS) Dated March 31, 2022. Comments with Regard Flare Sighting and Inaccurate Information in the DEIS

I am a local property owner whose residence is located directly west of the proposed project site. All of my 311 acres of coastal wetlands are adjoin the western boundary of the proposed CWLNG site. I am a degreed professional with over thirty of experience in the environmental field. I have worked as an Environmental Engineer, Environmental Coordinator and an Environmental Manager for one of the world's largest Oil and Gas companies in the world. Over 40 years of my career were spent working in Texas and Louisiana drilling for, producing and refining oil and gas reserves for consumption by US consumers, manufacturers and industries. My credentials are available upon request.

On page 2 of the introductory note of the DESI, FERC states the following. "The draft EIS addresses the potential environmental effects of the construction and operation of the following project facilities:

- two flare systems;"

In all of the documents submitted to FERC from CWLNG and their contractor TRC they have stated that they will utilize 4 flares for this project. CWLNG has identified three flare systems, consisting of a marine flare, a wet flare, a dry flare and a spare flare. See attached CWLNG and TRC documents. The fact that the basic components of the proposed facility cannot be presented accurately to the public for review and comment again demonstrates that this DEIS is inaccurate.

All of the 4 proposed flares will be located in Estuarine Forest areas. In Section 2.2 Land Requirements of the DESI FERC states the following; "Commonwealth would disturb 230.5 acres of land and open water for construction of the Project and 153.1 acres during its operation. Of this, 152.8 acres would be permanently disturbed at the Terminal site (including the 55.0 acres for the marine facility during both construction and operation) and 0.3 acre would be permanently disturbed due to the aboveground facilities associated with the Pipeline. The operational right-of-way for the Pipeline would measure 1.1 acres. Land requirements for the Project are summarized in table 2.2-1."

CWLNG has detailed flare exclusion zones on previous figures and TRC stated the following; "The thermal exclusion zones and vapor dispersion zones remain within site boundaries, as does the thermal radiation zone for the flare, in accordance with the siting requirements in 49 CFR Part 193 and other relevant regulations, codes, and guidelines." Nowhere in this document or in Table 2.2.1 are the Land Requirements for the four flares and their exclusion zones defined or quantified. Is their plan to site the four flares in open marsh land and Estuarine Forest with no fire protection buffer zone. Why are these exclusion zone acreages not include in the land use assessments. This DEIS and previous submittals by CWLNG have failed to provide information on how many acres of forest and wetlands these flare exclusion zones will effect for public review and comment. Venture Global's Calcasieu Pass facility flares are located in areas modified with limestone to provide a fire protection buffer.

Another issue related to the plan for the four flares that are supposed to be utilized in emergency events is that they are all located outside of their Hurricane Protection Wall. There are currently two shrimp boats 65' in length with 20' beams located in the Chenier forest area identified by CWLNG as WO3. See attached photos and map of boat locations. Similar boats of this construction weight approximately 80,000 lbs. These boats were driven into the Chenier and stranded during Hurricane Rita in 2005. What is to prevent a similar event from destroying the unprotected flare lines to the CWLNG flares as they are currently designed. According to CWLNG these flare lines are crucial to safe start-up, shutdown and operation of the facility during emergency operations and in the event of a hurricane. This area of the coast has been hit

IND7-1 See the response to comment PM8-3.

IND7-2 Commonwealth's noted flare exclusion zones are specified as personnel safety measures. Impacts on wetland or forest habitat would not be expected within these areas.

IND7-3 As discussed in section 4.12.1.5, the components of the Terminal that would be constructed outside of the stormwater protection wall would be designed per applicable codes, inclusive of elevation for the flood hazard area, wave, and wind loading. Building elevations would be derived and confirmed during the engineering of these structures, in a future stage of the project. The flares would be designed to withstand wave loading during a hurricane event

IND7-1

IND7-2

IND7-3

# INDIVIDUALS

## IND7- JOHN ALLAIRE

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by 4 major hurricanes in the last 17 years. As it should be all of the Venture Global flares systems are located within their hurricane protection walls. I would contend that the current design of the CWLNG flare systems are not and will not be protective of the environment during normal operation or in the event of an emergency.

The fact that the basic components of the proposed facility cannot be presented accurately to the public for review and comment again demonstrates that this DEIS has been rushed and should be officially withdrawn and revised with accurate and complete information. Additionally, the environmental and safety aspects of an inappropriate flare system design for a coastal facility has not been considered in this DEIS. I respectfully request at a minimum that FERC formally withdraw this DEIS until they can provide the public with complete and accurate information related to this project. If these issues cannot be investigated and resolved I would respectfully request that the Under the No-Action Alternative, the proposed project should not be permitted at this environmentally productive and sensitive area.

Thank for your attention to this matter.

John Allaire BS/MS

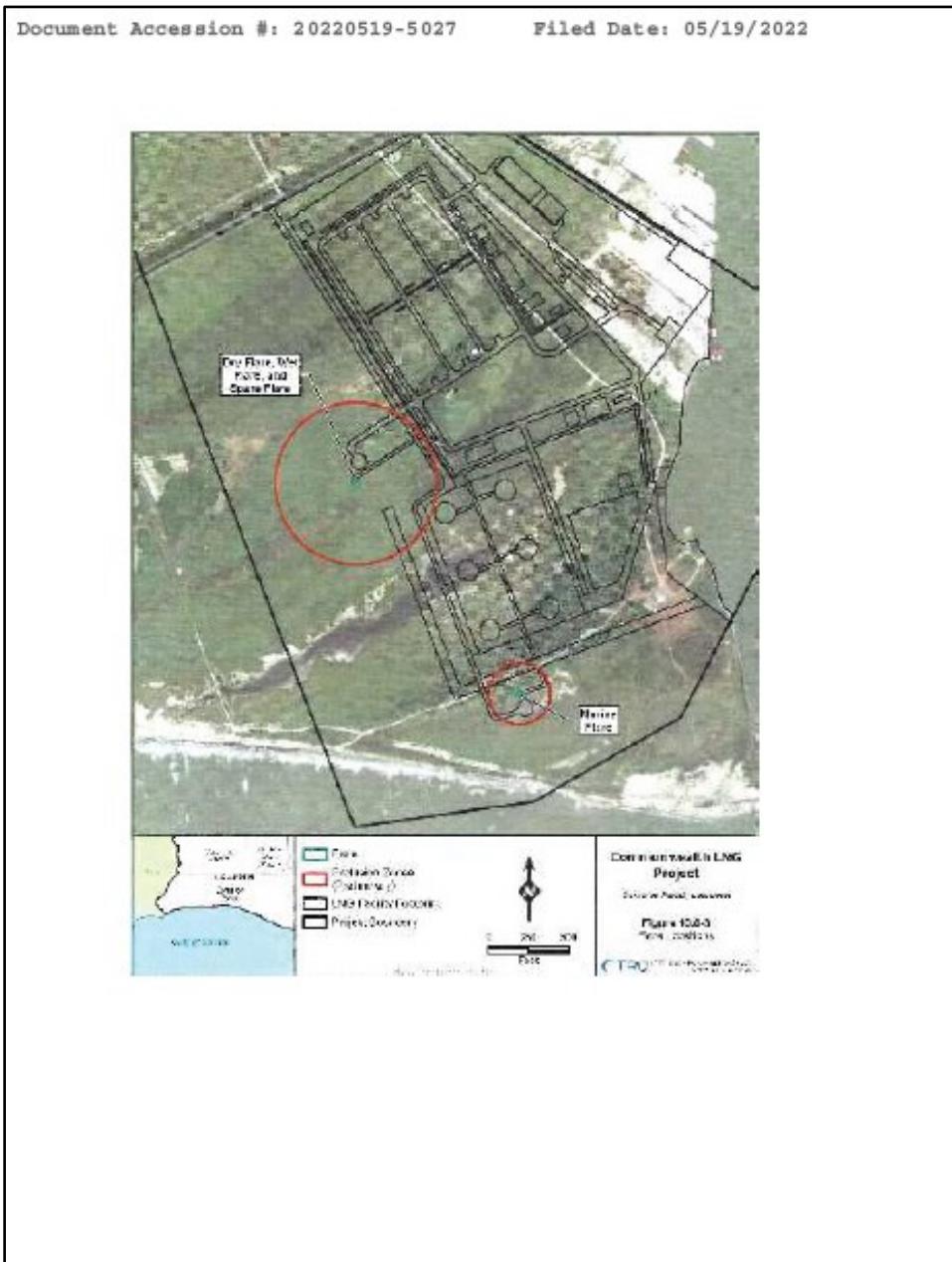
IND7-3

IND7-4

IND7-4 Comment noted.

# INDIVIDUALS

## IND7- JOHN ALLAIRE



# INDIVIDUALS

## IND7- JOHN ALLAIRE

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Filed Date: 05/19/2022



Accordingly, the modular approach was selected over the stick-built approach because of the shorter overall construction schedule, a reduction in onsite laydown workspace, a reduction in onsite construction emissions, and a reduction in onsite construction workforce; all of which contribute to reductions in environmental impacts.

### Liquefaction Technology

The use of multiple small liquefaction trains (rather than large liquefaction trains) is central to the Commonwealth design approach. Because the smaller trains are more readily constructed offsite as barge-transportable modules, they fit the Commonwealth modular approach to construction, which decreases the overall construction schedule, onsite laydown workspace, and onsite construction workforce, all of which contribute to reductions in environmental impacts.

The use of fewer, larger liquefaction trains was considered because of the potential reduction in land requirements because the spacing between liquefaction trains is driven by fire safety requirements. However, larger liquefaction trains constructed offsite must be transported by barge as "super-modules." These "super-modules" are larger than the modules associated with smaller liquefaction trains, which limits the number of vessels capable of transporting them, reducing flexibility and control of the construction schedule. More on-site assembly is required for larger liquefaction trains than for smaller liquefaction trains, which increases the requirement for onsite laydown workspace and onsite construction workforce. Based on a comparison of these advantages and disadvantages, multiple small liquefaction trains were selected.

### Flaring Alternatives

The LNG Facility requires four flares, each with a different function. A dry flare system will be needed for dry, cold releases originating in the mixed-refrigerant and LNG systems. A wet flare system for releases that contain moisture will be needed for relief loads in the pretreatment area, upstream of and including the dehydration unit, as well as from other offsite utility areas in the LNG Facility. A spare flare also will be installed that can handle either wet or dry releases. This flare will be used if maintenance is required on the wet or dry flare and will minimize downtime, minimize lost production, and allow six-train startup. Finally, a low-pressure marine flare will be installed to handle low-pressure releases during loading operations.

There are three main types of flares: elevated, ground, and enclosed. Selecting one over another depends on the following key factors:

- Maximum height allowed in the area to be permitted;
- Required plot area;
- Proximity to equipment or manned areas;
- Visual impact on the community;
- Schedules; and
- Price.

These factors were considered together for selection of the flare types for the four flares needed at the LNG Facility.

Commonwealth LNG Project  
April 2021

Appendix E  
Q1-3 Environmental Assessment Statement

# INDIVIDUALS

## IND7- JOHN ALLAIRE

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# INDIVIDUALS

## IND8

**IND8 is reclassified as CO5. See Non-Governmental Organizations  
comment CO5.**

# **INDIVIDUALS**

## **IND9**

**IND8 is reclassified as CO6. See Non-Governmental Organizations  
comment CO6.**

# INDIVIDUALS

## IND10- JOHN ALLAIRE

Document Accession #: 20220523-5010

Filed Date: 05/23/2022

### Comments on Docket CP19-502-000 to FERC in response to Draft EIS Report (DEIS) Dated March 31, 2022. Comments on Introductory Statements with Regard to Wildlife Resources and Project Sighting.

I am a local property owner whose residence is located directly west of the proposed project site. All of my 311 acres of coastal wetlands adjoin the western boundary of the proposed CWLNG site. I am a degreed professional with over thirty of experience in the environmental field. I have worked as an Environmental Engineer, Environmental Coordinator and an Environmental Manager for one of the world's largest Oil and Gas companies in the world. Over 40 years of my career were spent working in Texas and Louisiana drilling for, producing and refining oil and gas reserves for consumption by US consumers, manufacturers and industries. My credentials are available upon request.

In **Section 4.4.1.1** of the DEIS titled **Terminal** FERC states the following: "A total of 95.9 acres of wetlands would be impacted by construction of the Terminal, of which 89.6 acres would be permanently impacted for operations and 6.3 acres would be temporarily impacted during construction for a construction and laydown area. The 6.3 acres that would be temporarily impacted for the construction and laydown area and 65.8 acres of the permanently impacted area are EEM wetlands. The remaining permanent impact area consists of ESS (9.5 acres) and EFO (14.3 acres) wetlands. The majority (about 81 percent) of the Terminal site is comprised of wetlands."

On Page 1-5 of the DEIS Introduction under heading Wildlife Resources FERC states the following: "The primary impact on wildlife from construction of the Terminal and Pipeline would be the loss of estuarine emergent, scrub shrub, and forested wetland habitats and chenier habitat, which provide nutrients, cover, shelter, and water for a variety of terrestrial and aquatic wildlife species, including waterfowl, wading birds, nesting birds, raptors, mammals, reptiles, and amphibians. Construction of the Terminal and Pipeline could cause displacement, stress, and direct mortality of individual wildlife species that use these types of habitats. Operation of the Terminal would result in increased noise, lighting, and human activity that could disturb wildlife in the area and a reduction of usable habitat for most wildlife species currently inhabiting the area. However, due to the existing heavy ship traffic and other industrial uses along the Calcasieu Ship Channel, most wildlife in the area are likely accustomed to the noise and artificial lighting associated with these activities. Operation of the Pipeline would require minimal lighting, activities, or other disturbances that would affect wildlife.

The wetland and chenier habitats in the Project area are especially important as potential habitat for migratory bird species, including songbirds, colonial nesting waterbirds, and raptors. The Project is within the Gulf Coast Prairie Bird Conservation Region and the Chenier Plain Important Bird area. Chenier habitat provides critical in-transit habitat for migrating birds prior to and after crossing the Gulf of Mexico. Commonwealth consulted with the FWS and LDWF to determine measures Commonwealth would implement to avoid and minimize impacts on migratory birds. Measures include attempting to adhere to a vegetation clearing-restriction window of March 1 through July 31, adhering to FWS-recommended conservation measures related to minimizing impacts from flares and lighting, conducting pre-construction field surveys for evidence of colonial nesting waterbird rookeries and consulting FWS and LDWF if any are found, and protecting chenier habitat present in the Project area that would not be affected by construction.

We conclude that constructing and operating the Project would not significantly affect wildlife populations and wildlife habitat."

Some of the statements and conclusions as stated in this DEIS are inaccurate and misleading. As stated above "Chenier habitat provides critical in-transit habitat for migrating birds prior to and after crossing the Gulf of Mexico." Then FERC states "The primary impact on wildlife from construction of the Terminal and Pipeline would be the loss of estuarine emergent, scrub shrub, and forested wetland habitats and chenier habitat, which provide nutrients, cover, shelter, and water for a variety of terrestrial and aquatic wildlife species, including waterfowl, wading birds, nesting birds, raptors, mammals, reptiles, and amphibians. Construction of the Terminal and Pipeline could cause displacement, stress, and direct mortality of individual wildlife species that use these types of habitats.

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## IND10- JOHN ALLAIRE

Document Accession #: 20220523-5010

Filed Date: 05/23/2022

These are very true statements. They then go on to conclude the following: "However, due to the existing heavy ship traffic and other industrial uses along the Calcasieu Ship Channel, most wildlife in the area are likely accustomed to the noise and artificial lighting associated with these activities." This is an incorrect and misleading conclusion. Permanent loss of 65.8 acres of Estuarine Emergent marsh and 14.4 acres of Estuarine Forest at the project site will not only destroy that habitat it will significantly affect adjoining marshes and their resident species. The existing Chenier forest and emergent marsh habitat you are describing, and CWLNG will be destroying, currently provides a natural sound and light barrier from the existing heavy ship traffic and other industrial uses along the Calcasieu Ship Channel. These existing features shield the existing migratory and resident wildlife species from exactly the stress, and direct mortality of individual wildlife species from the increased noise, lighting, and human activity described above. Removal of these existing barriers will destroy the wildlife habitat at the site and cause a significant reduction of usable habitat for all of the wildlife species by degrading the habitat in the adjoining marsh.

In the DEIS the following statement is made: "Measures include attempting to adhere a vegetation clearing-restriction window of March 1 through July 31, adhering to FWS-recommended conservation measures related to minimizing impacts from flares and lighting, conducting pre-construction field surveys for evidence of colonial nesting waterbird rookeries and consulting FWS and LDWF if any are found, and protecting chenier habitat present in the Project area that would not be affected by construction."

This DEIS fails to define what "attempting to adhere a vegetation clearing-restriction window of March 1 through July 31. Will adherence to this restriction be a permit condition or just an attempt to comply with as is stated above. Either they are going to be required to adhere to restrictions or they will not adhere.

The second measure states that CWLNG will "adhere to FWS-recommended conservation measures related to minimizing impacts from flares and lighting". Venture Global Calcasieu Pass Facility flared almost continuously from their commissioning date in January through the end of April. In a period from January 27, 2022 until April 27, 2022 Venture Global flared night and day thought out the prime neo-tropical bird migration period. There were 5 only days during this 90 day period when they were not flaring. See attached photographs and I will provide additional time and date stamped photos upon request. CWLNG states that they will be flaring only 12 days per year in the DEIS. Please define in the EIS what measures will be taken if the proposed project is approved to prevent similar flaring events from occurring at the CWLNG site.

The third measure states that CWLNG will conduct pre-construction surveys for nesting bird colonies. I have been at the site on a daily basis for the past three months and have observed nesting mottled ducks, blue wing teal, black bellied whistling ducks, American avocets, black neck stilts' and many other species of shorebirds. Please confirm that the appropriate agency representatives will assist in or witness these pre-construction surveys. Additionally, I would request that these surveys will be used, in required annual follow up surveys, as a baseline for determining that wild life populations and habitat have not be significantly affected as is stated by FERC in the DEIS. As a side note several Black Rails have been located on the property adjoining the proposed CWLNG facility as recently as of May 2022.

How can the public be expected to respond intelligently to the project's environmental affects if incomplete, inaccurate and misleading information and conclusions are presented in the DEIS. I respectfully request at a minimum that FERC formally withdraw this DEIS until they can provide the public with complete and accurate information related to this project. If these issues cannot be investigated and resolved I would respectfully request that the Under the No-Action Alternative, the Project should not be permitted at this environmentally productive and sensitive area.

Thank for your attention to this matter.

John Allaire BS/MS

IND10-1

IND10-1 The potential impacts of the Project on wildlife species are discussed in section 4.6.1.

IND10-2

IND10-2 As noted in section 4.6.1, if the construction schedule requires clearing during the migratory bird nesting season, Commonwealth would consult with the FWS regarding appropriate methods to minimize impacts on migratory birds.

IND10-3

IND10-3 Commonwealth's revised flaring duration and the potential impacts of flaring on migratory birds are provided in provided in sections 2.1.1.4, 4.6.1.3, and 4.11.2.4

IND10-4

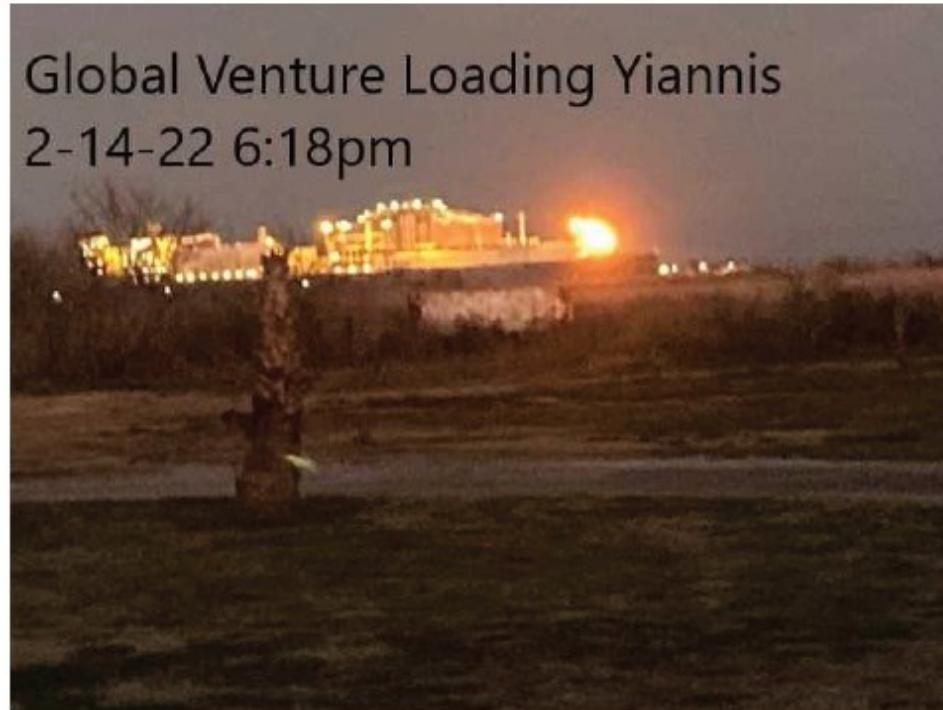
IND10-4 As noted in section 4.6.1, Commonwealth would conduct field surveys for colonial waterbird nesting colonies using qualified biologists no more than 2 weeks prior to the commencement of construction, should construction clearing occur between February 15 and September 15.

# INDIVIDUALS

## IND10- JOHN ALLAIRE

Document Accession #: 20220523-5010

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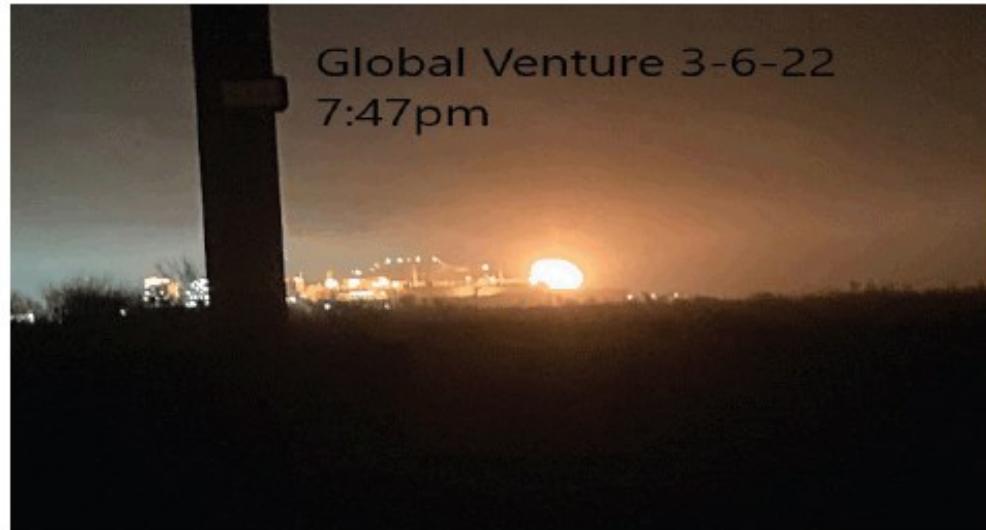


# INDIVIDUALS

## IND10- JOHN ALLAIRE

Document Accession #: 20220523-5010

Filed Date: 05/23/2022



Global Venture 3-6-22  
7:47pm



Venture Global Loading Elise Larus  
3-27-22 733pm

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## IND10- JOHN ALLAIRE

Document Accession #: 20220523-5010      Filed Date: 05/23/2022



# **INDIVIDUALS**

## **IND11**

**IND11 is reclassified as CO7. See Non-Governmental Organizations comment CO7.**

# INDIVIDUALS

## IND12- JOHN ALLAIRE

Document Accession #: 20220523-5039

Filed Date: 05/23/2022

Comments on Docket CP19-502-000 to FERC in response to Draft EIS Report (DEIS) Dated March 31, 2022. Comments with Regard to Project Purpose, Conclusions and Bias.

I am a local property owner whose residence is located directly west of the proposed project site. All of my 311 acres of coastal wetlands are adjoin the western boundary of the proposed CWLNG site. I am a degreed professional with over thirty of experience in the environmental field. I have worked as an Environmental Engineer, Environmental Coordinator and an Environmental Manager for one of the world's largest Oil and Gas companies in the world. Over 40 years of my career were spent working in Texas and Louisiana drilling for, producing and refining oil and gas reserves for consumption by US consumers, manufacturers and industries. My credentials are available upon request.

Commonwealth states that the purpose and objective of the proposed Project is "to liquefy and export to foreign markets, domestically produced natural gas sourced from the existing interstate and intrastate pipeline systems of Kinetica and Bridgeline, respectively, in southwest Louisiana." FERC

In the DEIS Introduction under the Socioeconomics section FERC states the following: "Construction of the Project would result in **minor positive economic impacts** due to increases in construction jobs, payroll taxes, purchases made by the workforce, and expenses associated with the acquisition of material goods and equipment. Operation of the Project would have a **minor positive effect** on the local governments' tax revenues due to the increase in property taxes that would be collected. Construction of the Project would not have a significant adverse impact on local populations, employment, and provision of community services, housing, or property values. "

FERC goes on the state: "The proposed Project would have a range of **impacts** on the environment and on individuals living in the vicinity of the Project facilities, including environmental justice populations. Based on the scope of the Project and our analysis of the Project's impacts on the environment, we have determined Project-related **impacts** on wetlands, surface water, aquatic resources, visual resources, recreation, socioeconomic, traffic, noise, and air quality **may adversely affect the identified environmental justice communities**. In general, the magnitude and intensity of the impacts would be greater for individuals and residences closest to the Project's facilities and **would diminish with distance**. Based on our analysis, the **impacts** experienced by the environmental justice communities in the Project area would not be predominately borne by the environmental justice community. Therefore, **impacts would not be disproportionately high and adverse** as the Project would not be located in an environmental justice community and the closest residents are not located in an environmental justice community." **Yes these impacts will be borne by all of the local communities.** "However, environmental justice communities **would experience significant impacts** associated with the viewshed of the new Terminal facilities. Regarding environmental justice communities, we have determined environmental justice communities in the study area would experience **cumulative impacts** on wetlands, surface water, aquatic resources, socioeconomic, traffic, noise, air quality, greenhouse gas (GHG) and **significant visual cumulative impacts** related to the Project and the additional projects within the respective geographic scopes of the Project." In these comments **FERC mentions several adverse affected communities and significant and cumulative impacts on the environment and the local communities which are somewhat diminished with distance.** I would agree with this part of FERC's conclusions that the further away from this proposed noisy, pollution spewing, wetlands destroying, wildlife taking and viewshed altering facility the impacts will be reduced.

FERC goes on to state: "Independent of whether the Project is constructed, other LNG export projects may still be developed in the Gulf Coast region or elsewhere in the United States and these projects would cause both adverse and beneficial impacts on the environment. Under the No-Action Alternative, the

IND12-1

Comment noted.

IND12-1

# INDIVIDUALS

## IND12- JOHN ALLAIRE

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Project would not be developed and Commonwealth's objective of liquefying and exporting natural gas to foreign markets would not be realized." Under the NO-Action Alternative the exporting of natural gas to foreign markets would not be realized and costs of energy for US domestic consumers, manufacturers and industries would be reduced leading to decreased inflation and lower domestic prices for goods and services. As has been reported in many studies the people on the lower economic ladder and fixed incomes suffer the most with increased inflation. In recent publications the US Energy Information Administration (USEIA) has reported that increases in domestic use of dirty coal by US electric power providers. In an August 2021 report, the USEIA reported that higher US natural gas prices could be tied directly to rising consumption for sectors other than electric power providers and growth in exports of LNG. How is expanded permitting of these energy export terminals consistent with the public interest.

In the DEIS Introduction under title Cumulative Impacts FERC states the following: "Our analysis of cumulative impacts includes other projects in the vicinity of the proposed Commonwealth Project that could affect the same resources as the Project in the same approximate timeframe. We generally conclude that the potential impacts of the Project, when combined with the impacts from the other projects considered in the geographic scopes, would not result in a significant impact on resources." These statements are inaccurate, 80 % of the Global Venture Calcasieu Pass facility was built on mostly predisturbed land. The GV facility was built on land that was used to deposit dredge spoils during the construction of the Calcasieu River Ship Channel beginning in the 1920 and in subsequent maintenance dredging projects. Much of the Global Venture site was also part of the former Calcasieu Pass Gas Field. This changed the entire dynamics of the Global Venture project site. Piles of dredge spoils and old well locations at the Venture Global project site can be observed on USGS quadrangle maps. See attached USGS 1982 Cameron Quadrangle. 80% of the Global Venture facility was built on pre disturbed land. Less than 15% of the proposed CWLNG pipeline, marine berth and facility footprints has been disturbed by other than minor human activity. Global Ventures project EIS described the following for permanent wetlands loss: 20.9 acres of estuarine emergent wetlands (EEM) , .7 acres of estuarine scrub-scrub and 0 acres of estuarine forest. The CWLNG DEIS lists the permanent loss of 65.8 acres of estuarine emergent wetlands, 20.9 acres of estuarine forest (Chenier's) and 9.5 acres of estuarine scrub-scrub which is prime black rail habitat. No accurate comparative conclusion can be drawn between clearing estuarine forest, backfilling EEM and concreting over Chenier's and wetlands at the CWLNG proposed location and what has occurred at the GV facility.

FERC also states "Commonwealth's proposed mitigation measures would minimize or offset Project impacts on local resources." There is no way that any proposed mitigation measures can minimize or offset the loss of these Chenier and wetland habitats that took nature tens of thousands of years to create.

With regard to bias in preparing this document I noted the following. In the List of Preparers for the DEIS not one of the 34 preparers listed an academic credential from a State of Louisiana institution of higher learning, college or university. I am very concerned with the apparent location bias in sighting these projects in Louisiana and Texas. I am also very concerned about the increasing detrimental effects of energy and consumer product inflation on lower and fixed income families in the US due to FERC's continued permitting of these energy export facilities. I respectfully request that FERC implement the NO-Action Alternative for this and other similar domestic energy export projects.

Thank for your attention to this matter.

John Allaire BS/MS Physical Sciences

IND12-2

IND12-2

Purpose and Need is discussed in section 1.1. The Commission will determine if the project meets the public interest standard provided in section 3(a) of the Natural Gas Act. 15 U.S.C. § 717b(a).

IND12-3

IND12-3 See the response to comment PM10-1.

IND12-4

IND12-4 See the response to comment CO2-29.

IND12-4

IND12-5 The subject of preparer bias is addressed in the response to comment PM8-7. Regarding the commenter's statement of location bias in siting projects in Louisiana and Texas, the oil and gas industry is well established in Louisiana and Texas and the location of these projects does not indicate bias against the states. The Project Purpose and Need is discussed in section 1.1.

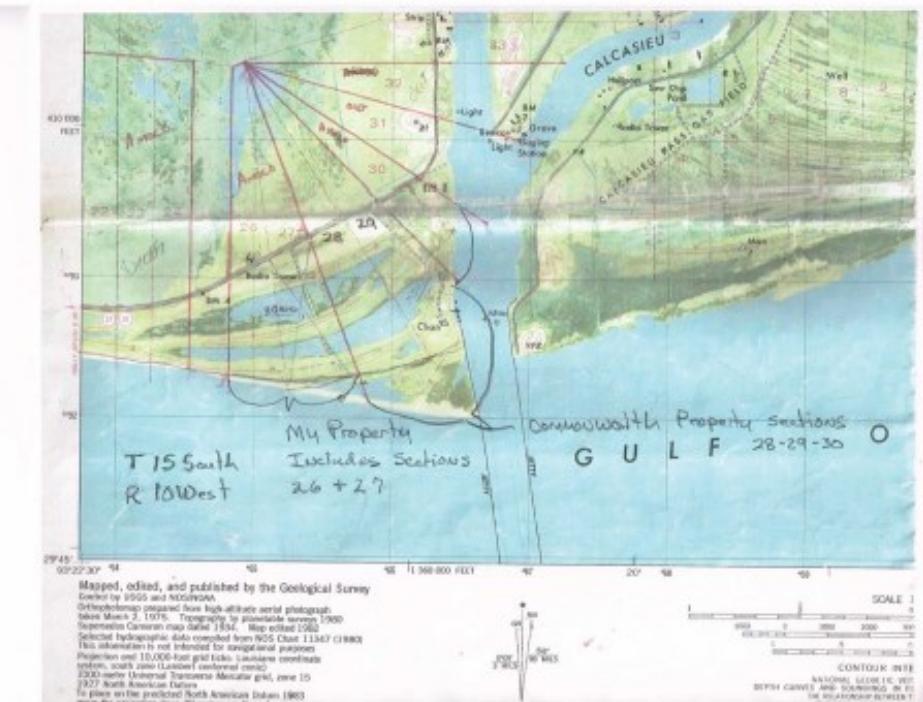
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# INDIVIDUALS

## IND13- JOHN ALLAIRE

Document Accession #: 20220523-5041

Filed Date: 05/23/2022

### Comments on Docket CP19-502-000 to FERC in response to Draft EIS Report (DEIS) Dated March 31, 2022. Comments on Ocean Dumping

I am a local property owner whose residence is located directly west of the proposed project site. All of my 311 acres of coastal wetlands are adjoin the western boundary of the proposed CWLNG site. My property includes 3000' of shoreline on the Gulf of Mexico which is directly north of the proposed dumping area for the CWLNG dredge spoils. See attached USGS map. I am a degreed professional with over thirty of experience in the environmental field. I have worked as an Environmental Engineer, Environmental Coordinator and an Environmental Manager for one of the world's largest Oil and Gas companies in the world. Over 40 years of my career were spent working in Texas and Louisiana drilling for, producing and refining oil and gas reserves for consumption by US consumers, manufacturers and industries. My credentials are available upon request.

In Commonwealth's Response for Information Request Dated February 18, 2022, in which Commonwealth responded to FERC's inquiry regarding dredge disposal locations and the mitigation of impacts to estuarine water bottoms Commonwealth responded that they abandoned their plans to mitigate by BUDM and instead were utilizing compensatory mitigation credits and coordinating with the Corps to conduct near shore disposal of the marine berth dredge material.

In the introduction of the DEIS CWLNG or FERC stated that the Dredging of the marine facility and subsequently placing the dredge spoils at a nearshore dredge materials placement area (DMPA) would temporarily affect 47.0 acres of estuarine mud bottom and estuarine water column at the marine facility and 1,100 acres of nearshore marine non-vegetated bottom and marine water column at the DMPA. FERC concludes that sedimentation and turbidity impacts on aquatic resources from dredging would be localized, temporary to short-term, and not significant. I disagree and would refer to 40 Code of Federal Regulations (CFR) 220-229.

Under the MPRSA, EPA is responsible for establishing criteria for reviewing and evaluating permit applications. EPA is responsible for issuing ocean dumping permits for materials other than dredged material. In the case of dredged material, the U.S. Army Corps of Engineers (USACE) is responsible for issuing ocean dumping permits, using EPA's environmental criteria. Permits for ocean dumping of dredged material are subject to EPA review and written concurrence. EPA is also responsible for designating and managing ocean disposal sites for all types of materials.

EPA and USACE together develop site management and monitoring PLANS (SMMPs) for each designated ocean dredged material disposal site. EPA's Ocean Dumping Management Program, often in coordination with USACE, conducts oceanographic surveys at these ocean disposal sites to evaluate environmental conditions at the site and to determine what management actions may be needed. There were no oceanographic surveys provided in this DEIS at this ocean disposal site to evaluate environmental conditions at the site and to determine what management actions may be needed. It is required that the public be provided with this information so they may comment on the site management and monitoring plans prior to agency approvals.

IND13-1

Discussion of Commonwealth's newly proposed BUDM site in place of the previously proposed DMPA is provided in sections 2.5.1.1. and 4.4.2.2.

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EPA's ocean dumping regulations are published at 40 Code of Federal Regulations (CFR) 220-229, and include the criteria and procedures for ocean dumping permits and for the designation and management of ocean disposal sites under the MPRSA. In addition, USACE has published regulations under various provisions of 33 CFR 320, 322, 324, 325, 329, 331, and 335-337.

Nowhere in this DEIS is there documentation of the EPA's PLAN review of this proposed permit for ocean dumping of dredged material and no EPA written concurrence is provided for public review or comment. This information is required as is detailed in 40 code of Federal Regulations (CFR) 220-229, Title 33, Section 1412 (3), Dredged Material Disposal Sites. In the case of dredged material disposal sites, the EPA Administrator, in conjunction with the Secretary of ACOE, shall develop a site management PLAN for each site designated pursuant to this section. In developing such PLANS, the Administrator and the Secretary shall provide opportunity for public comment.

Such PLANS shall include, but not be limited to— (A) a baseline assessment of conditions at the site; (B) a program for monitoring the site; (C) special management conditions or practices to be implemented at each site that are necessary for protection of the environment; (D) consideration of the quantity of the material to be disposed of at the site, and the presence, nature, and bioavailability of the contaminants in the material; (E) consideration of the anticipated use of the site over the long term, including the anticipated closure date for the site, if applicable, and any need for management of the site after the closure of the site; and (F) a schedule for review and revision of the plan (which shall not be reviewed and revised less frequently than 10 years after adoption of the plan, and every 10 years thereafter).

Section 1413 goes on to state that the Dumping permit program for dredged material (a) Issuance by Secretary of the Army Subject to the provisions of subsections (b), (c), and (d) of this section, the Secretary may issue permits, after notice and opportunity for public hearings, for the transportation of dredged material for the purpose of dumping it into ocean waters, where the Secretary determines that the dumping will not unreasonably degrade or endanger human health, welfare, or amenities, or the marine environment, ecological systems, or economic potentialities.

Nowhere in this DEIS is there documentation of the EPA's or the ACOE's PLAN or review of this proposed permit for ocean dumping of dredged material and no EPA written concurrence is provided for public review or comment as is required by is required in 40 code of Federal Regulations (CFR) 220-229 Title 33. Without this required information, neither the sister agencies, interested groups or the public can properly evaluate nor comment on the severity of the adverse effects of the CWLNG disposal Plan. Based on lack of statutorily required information, public notice and opportunity for public hearings in this DEIS I respectively request the No action alternative be selected for this proposed project.

John Allaire BS/MS Physical Sciences

IND13-1

Discussion of Commonwealth's newly proposed BUDM site in place of the previously proposed DMPA is provided in sections 2.5.1.1. and 4.4.2.2.

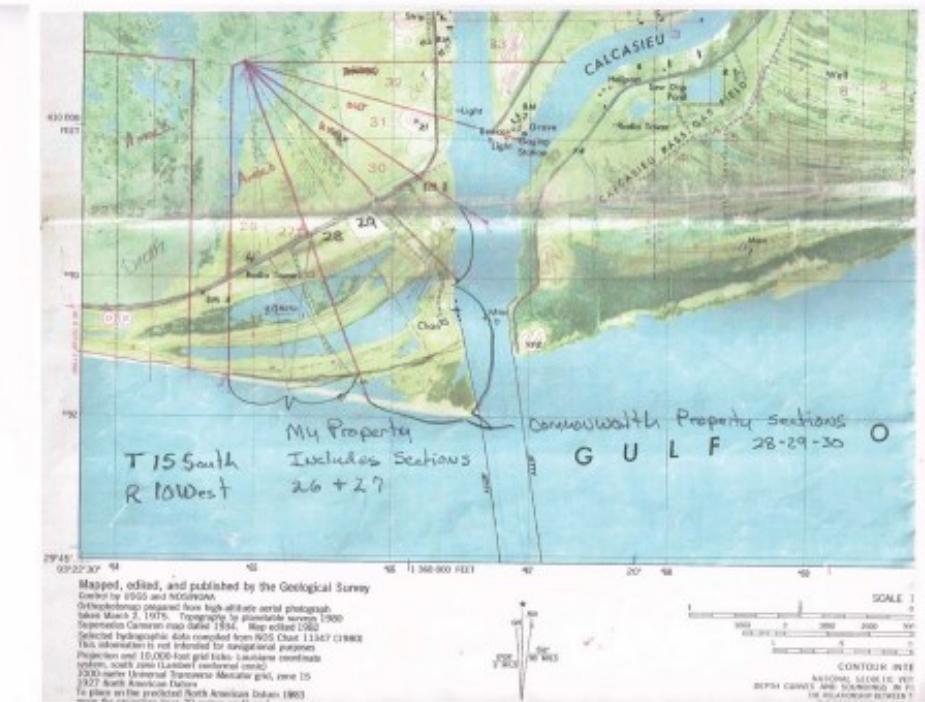
IND13-1

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### IND13- JOHN ALLAIRE

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# INDIVIDUALS

## IND14- JOHN ALLAIRE

Document Accession #: 20220523-5120

Filed Date: 05/23/2022

### Comments on Docket CP19-502-000 to FERC in response to Draft EIS Report (DEIS) Dated March 31, 2022. Comments on Noise Concerns at NSA 2

#### Contesting Permit Application Due to Noise Impacts at NSA2.

FERC states on page 4-422 of the DEIS the following: "The nearest NSA to the proposed Terminal, is an RV site used as a year-round residence by the landowner (NSA 2), is approximately 0.4 mile to the west." "Terminal construction is estimated to last 36 to 38 months and would involve disturbance of the entire site and surrounding area." To be accurate the recently re-designated NSA 2 is located less than 1900' from the CWLNG liquefaction Plant, less than 1800' from their main flare system and only 750' from their facility boundary where construction activities would occur.

#### Federal Regulatory Statute 18 CFR § 157.206(b)(5)(i)(5) states the following

- (i) The noise attributable to any new compressor station, compression added to an existing station, or any modification, upgrade or update of an existing station, must not exceed a day-night level (Ldn) of 55 dBA at any pre-existing noise-sensitive area (such as schools, hospitals, or residences).
- (ii) A compressor facility installed under this section must be designed to meet the following noise emissions criteria. For each new compressor station facility, and for each addition or modification to an existing compression station, the blanket certificate holder must file a noise survey with the Secretary within 60 days of placing the facility in service.

The DEIS states the following: "Operation of the Terminal site would produce noise on a continuous basis. Many of the dominant noise sources (compressor piping and air coolers) would be at elevations of more than 20 feet above grade and, as such, may have a greater influence on NSAs than if ground based."

FERC states that "Excavation and dredging would be required to construct the marine facility and create a berthing area for LNG carriers. Commonwealth would excavate the upland area associated with the marine facility using a land-based excavator. Commonwealth would dredge the open water associated with the marine facility using a barge-mounted cutterhead suction dredge. **Dredging would begin within the first nine months of construction and last for 17 months** (Commonwealth would also dredge the marine facility footprint every two years during operation, which would require approximately 7 days to complete). Dredging would be conducted on a continuous, 24-hour schedule and in accordance with COE and USCG regulations and FWS and NOAA guidelines to minimize potential impacts on protected species.

Primary noise sources from dredging activities would include diesel engines with associated pumps, as well as a tugboat used to position the dredge for in-water activities and construction equipment and dump trucks for transportation of soils and other materials on land. Table 4.11.2-5 provides the modeled noise impacts for the dredging activities at NSAs 1 and 2. Given the broad extent along the Terminal shoreline that dredging would occur, Commonwealth modeled the

IND14-1

The summary text in section 4.13.2.9 states NSA 2 is approximately 0.4 mile to the west of the proposed Terminal. As noted, this is an approximation. NSA 2 is approximately 0.35 mile west of the proposed stormwater protection wall on the west side of the Terminal. Section 4.11.2 provides more specific distances to NSA 2.

IND14-1

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## IND14- JOHN ALLAIRE

The modeling results indicate that the total noise impacts ( $L_{eq}$ ) during peak construction activities (table 4.11.2-3), and the maximum noise impacts ( $L_{max}$ ) during peak pile driving (table 4.11.2-4), would exceed expected ambient sound levels at NSAs 1 and 2 by more than 10 dBA (i.e., the increase in noise would be perceived as twice as loud as ambient conditions). The total construction noise impacts appear to be driven by  $L_{eq}$  values of the civil works activities (i.e., earth moving equipment). However, the modeled results are considered as worst-case scenarios; these increases over ambient noise would be short term and would occur primarily during daytime hours. The only construction activities to occur during nighttime hours would be dredging operations (table 4.11.2-5). Dredging would increase noise relative to ambient levels at NSA 1 by approximately 5 dBA, which would also exceed the 55 dBA threshold. Therefore, **we recommend that:**

- Prior to the end of the draft EIS comment period, Commonwealth **should** file with the Secretary a dredging noise mitigation plan that includes the measures it would implement to reduce the projected nighttime (10 pm to 7 am) noise levels to at or below 55 dBA  $L_{dn}$  at NSA 1, and how it would monitor the noise levels during dredging activities. Be aware that a calibrated and certified continuous noise monitoring system with a data recorder will be installed at NSA2 upon beginning of any dredging or construction activities if this proposed project is permitted. If any civil construction or**

IND14-2

The recommendations in the final EIS are those of the FERC environmental staff. If the Commission authorizes the Commonwealth LNG Project, FERC staff recommends that the measures listed in section 5.2 be included as specific conditions in the Commission's Order.

IND14-2

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dredging activities exceed the 55dBA  $L_{dn}$  at NSA 2. I would then request that the CWLNG be ordered, not recommended, to implement a construction and dredging mitigation plan prior to resuming aforementioned activities similar to the recommendation indicated for NSA1 in this document.

IND14-2

# INDIVIDUALS

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Be aware that a calibrated and certified continuous noise monitoring system with a data recorder will be installed at NSA2 upon beginning of operations of this facility. If operation of this facility noise levels exceed the 55dBA Ldn at NSA 2. I would then request that the CWLNG shutdown until a noise mitigation system be installed and tested prior to resuming operation of the facility.

### Flares

As noted in section 2.1.1.4 of the DESI FERC states the following: "the Terminal would include two flare systems, one associated with the liquefaction facilities and one associated with the marine facility, for venting excess natural gas, if necessary, during maintenance, startup/shutdown, and upset activities. Outside of emergency situations, Commonwealth estimates flaring would be required for approximately 5 days during startup of the Terminal and then for no more than 12 hours during the first year of operation and 6 hours per year in subsequent years." Commonwealth expects the durations of different emergency events to last approximately 1 hour per event at likely frequencies of once every 3, 5, or 25 years depending on the emergency type. Commonwealth expects shutting down the Terminal due to a hurricane would require 6 hours of flaring (i.e., one hour per train), which would represent the largest flaring event. The noise associated with the flare operation as detailed above will clearly exceed the requirements detailed in **Statute 18 CFR § 157.206(b)(5)(i)(5)** at the propose project location.

Venture Global Calcasieu Pass Facility flared almost continuously from their commissioning date in January through the end of April. In a period from January 27, 2022 until April 27, 2022 Venture Global flared night and day thought out the prime neo-tropical bird migration period. There were 5 only days during this 90 day period when they were not flaring. See attached photographs and I will provide additional time and date stamped photos upon request for the aforementioned months and the month of May 2022 if requested. They continue to flare as I prepare this document. Not only can I see both of Global Venture's flares with the current northeast wind I can hear their flares operating from my patio. See attached photo from 5-22-22. CWLNG states that they will be flaring only 12 days per year in the DEIS. Please define in the EIS what measures will be taken if the proposed project is approved what is to prevent similar flaring events from occurring at the CWLNG site.

Start-up and normal operations-related flaring activity would not result in noise levels in exceedance of the 55 dBA threshold at either NSA. Emergency flaring activities could result in maximum (L<sub>max</sub>) and day-night (L<sub>dn</sub>) noise levels upwards of 70 dBA at both NSA 1 and 2. However, these events would be, by definition, emergency events and would be temporary (approximately 1 hour in duration) or during times when the NSAs are unlikely to be populated (i.e., during hurricane evacuations). FERC states the following about flare operations: "Therefore, we conclude noise impacts from flaring would not be significant." The noise associated with the flare operation as detailed above will clearly exceed the requirements detailed in **Statute 18 CFR § 157.206(b)(5)(i)(5)** at the propose project location.

IND14-3

IND14-3

See section 4.11.2.4, in which we provide noise conditions related to operational noise levels and recommend approaches for Commonwealth to comply with the requirement of operating the Terminal at noise levels below an L<sub>dn</sub> of 55 dBA.

IND14-4

See comment PM8-2.

IND14-4

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**In their Noise Conclusions found page 4-263 of the DEIS FERC draws the following conclusions.**

### 4.11.2.5 Noise Conclusions

Construction activities are projected to last approximately 36 months. Civil works (i.e., earth moving) could result in noise impacts greater than 55 dBA at NSA 2; pile driving maximum noise levels ( $L_{max}$ ) during the peak construction period would result in noise impacts greater than 55 dBA at NSAs 1 and 2;

With implementation of an effective noise mitigation plan for dredging, the increases in noise levels during construction would be short-term (how is 36 months considered short term) and would occur during daytime hours (7 a.m. to 10 p.m.) (The January sunset in Cameron Louisiana occurs at about 6pm). Based on the analyses conducted and our recommendations, we conclude that operation of the Terminal would not result in significant noise impacts on the NSAs.

The facts as presented in the DEIS detail that the operational noise levels at NSA2 are only .4  $L_{dn}$  below required noise requirements. Even FERC questions these numbers and recommends, (not requires) that a statutorily required noise survey be conducted. The construction and flare noise levels as presented in the DEIS exceed regulatory requirements. One can only conclude that the noise levels at NSA2 will not meet the regulatory requirements. I request that the No Action Alternative for this proposed project be selected.

John Allaire

621 Gulf Beach HWY Holly Beach, Louisiana 70631

IND14-5

Section 4.11.2 has been revised to reflect that the anticipated duration for dredging is 5 months. Impacts related to construction activities are considered temporary. Section 4.11.2 also contains our recommendation that Commonwealth monitor construction noise levels between 7:00 p.m. and 7:00 a.m. and restrict noise attributable to construction activities to no more than 55 dBA  $L_{dn}$  (48.6 dBA) at NSAs 1 and 2.

IND14-5

IND14-6

Comment noted. Commission staff has included the recommendations in section 4.11.2.4 to ensure the noise levels are met. As noted in our response to comment IND14-2, the recommendations in the final EIS are those of the FERC environmental staff. If the Commission authorizes the Commonwealth LNG Project, FERC staff recommends that the measures listed in section 5.2 be included as specific conditions in the Commission's Order.

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**IND14- JOHN ALLAIRE**

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# **INDIVIDUALS**

## **IND15**

**IND15 is reclassified as CO8. See Non-Governmental Organizations comment CO8.**

# INDIVIDUALS

## IND16- JOHN ALLAIRE

Document Accession #: 20220524-5014

Filed Date: 05/24/2022

Comments on Docket CP19-502-000 to FERC in response to Draft EIS Report (DEIS) Dated March 31, 2022. Comments with regard to tidally influenced areas affected by this project.

I am a local property owner whose residence is located directly west of the proposed project site. All of my 311 acres of coastal wetlands drain through main footprint of the proposed CWLNG site. I am a degreed professional with over thirty of experience in the environmental field. I have worked as an Environmental Engineer, Environmental Coordinator and an Environmental Manager for one of the world's largest Oil and Gas companies in the world. Over twenty years of career were spent working in Louisiana. My credentials are available upon request. Much of my property is tidally influenced and will be directly affected by the proposed project. I have been living at this site since 1998 and have observed the tidal action in this area for 24 years. The current mapping of area drainage plan and tidally influenced areas as presented in the DEIS are incomplete and inaccurate.

With regard to delineation of tidally influenced areas affected by this project FERC in a March 31, 2022 letter to NOAA NMFS the USACE stated the following: "As of March 31, 2022, the U.S. Army Corps of Engineers had not completed its official accounting of the acreage of wetlands that it considers to be tidally influenced at the LNG terminal site; therefore, the final acreage total of EFH that would be affected by construction of the Project could vary from that presented here." The DEIS presents to the sister agencies or the public "no official accounting of the acreage of wetlands that it considers to be tidally influenced at the LNG terminal site."

I contend that the amount of tidally influenced wetlands as currently presented in the DEIS is inaccurate and greatly underreported. In this DEIS the agencies have failed to disclose the extent of the tidally affected wetlands or the how the adjacent area drainage will not be disrupted. I conducted a limited study of the of the tidal elevations at the tidal drains that connect the water body identified on CWLNG wetland delineation maps as CO2 with the property south of State HWY 27. See the map below. The attached Power Point presentation shows the locations of the tidal drains located along HWY 27. These tidal drains are located under the road and provide tidal flow into the marsh south of Hwy 27. The SW tidal drain is located on Section 27 which adjoins section 28 of the proposed CWLNG project site. GPS coordinate of the SW and NE tidal drains are provided along with a photo of the SW tidal drain.

Slides 4 -7 in the PowerPoint presentation are date and time stamped and show the tidal levels at that moment in time. This series of photos detail the tidal elevation variations south of HWY 27 over the last 2 weeks. Additional photos and tidal elevations were collected and can be provided upon request. These tidal readings vary by as much as 10.16 inches over period of this study. CWLNG Figure 9, which is included in the Power Point presentation, details the Mean High Water elevations = to +.88' NAVD elevations that are flooded by high tide events. These events occur regularly at this site.

In addition the high tides this weekend over topped the gulf shore line dunes and flooded tidal water into water body SLO1 which is identified on the aforementioned wetland delineation map. Photos and videos can be provided upon request.

How can the public be expected to respond intelligently to the project's environmental affects if tidal information is not provide in this DEIS. I respectfully request at a minimum that FERC formally withdraw this incomplete DEIS until they can provide their sister agencies and the public with complete and accurate information related to this project.

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If FERC is unable to provide complete and accurate information with regard to the aforementioned issue I would respectfully request that FERC select the NO Action alternative for this project at this environmentally productive and sensitive area. Thank for your attention to this matter.

IND16-1

IND16-1

Updated Project impacts on wetlands and Commonwealth's proposed mitigation are discussed in section 4.4.2.

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## IND16- JOHN ALLAIRE

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HWY 27 Drainage locations  
under HWY 27 to water body  
CO2 and tidally influenced  
areas at the project site



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## IND16- JOHN ALLAIRE

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South east tidal flow culvert located on Section 27 adjoining the proposed CWLNG site. Looking East. Tidal flow to and from water body CO2 located at 29°46'15.46" N by 93°21'31.47" W. A second tidal flow culvert is located on Section 30 at location 29°46'27.40" N by 93°21' 06.84" W.

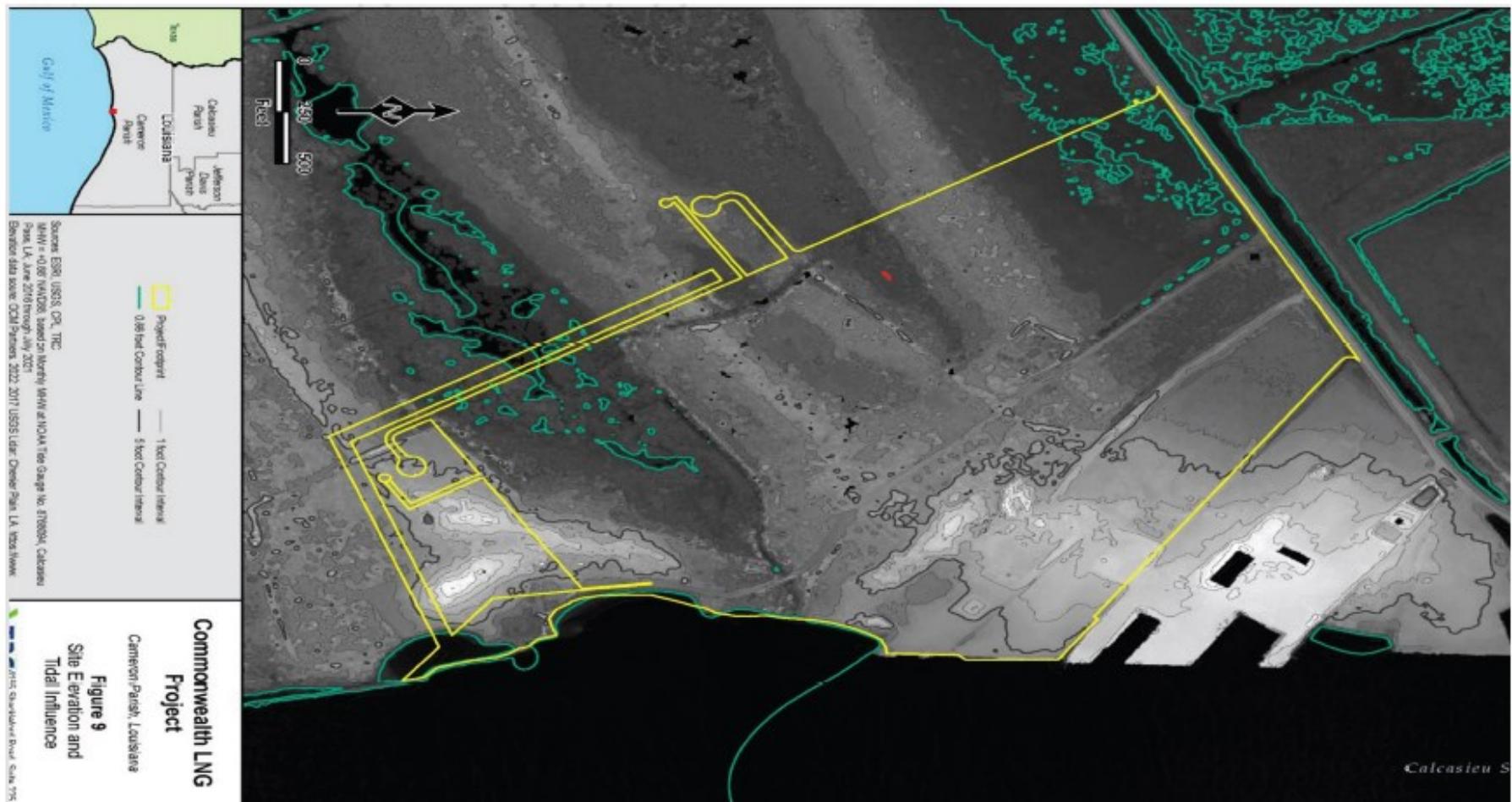


# INDIVIDUALS

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Tidal elevation  
65.80 tens/ft SW  
Tidal Culvert



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## IND16- JOHN ALLAIRE

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Tidal Elevation  
67.20 tens/ft SW  
Tidal Culvert



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IND16- JOHN ALLAIRE

Document Accession #: 20220524-5

Filed Date: 05/14/2022

**Tidal elevation**  
**62.60 tens/ft SW**  
**Tidal Culvert**



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Tidal elevation  
62.20 tens/ft SW  
Tidal Culvert



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Tidal elevation  
70.60 tens/ft SW  
Tidal Culvert



# INDIVIDUALS

## IND17- JOHN ALLAIRE

Document Accession #: 20220524-5020

Filed Date: 05/24/2022

### Comments on Docket CP19-502-000 for Commonwealth LNG Project Response to Commonwealth's "Response to CWLNG Claims of May 23, 2022

I would like to address several inaccuracies, omissions and misstatements in CWLNG's May 23, 2022 submittal to FERC. There are several inaccuracies and omissions in their most recent submission to FERC. I will restate that the site pavilion has a 50' by 30', 6" thick concrete slab that is reinforced with nylon fibers and pretensioned stainless steel aircraft cable. This pavilion was one of the only structures in lower Cameron Parish which was not damaged or destroyed by Hurricanes Laura and Delta. Commonwealth stated that "Mr. Allaire parks his camper trailer on the occasions when he intermittently visits Louisiana". I purchased this camper in December of 2016 and the trailer has been parked continuously at this location since that date. The two occasions when this trailer was not at this location was during the evacuations related to hurricanes Laura and Delta in 2020.

Commonwealth goes on to state that "In this regard Commonwealth personnel have rarely seen Mr. Allaire at this location." I'm not sure if this is a misstatement or mistruth. I was unaware that Commonwealth was observing and documenting my presence in Cameron Parish. Upon request I can provide dated, 2022 credit card receipts that will document my presence in Cameron Parish. Additionally, I can provide phone records and statements from Cameron Parish residents that will document my presence in Cameron Parish during the past three years.

I am currently in discussions with a local builder to construct a permanent residence at this location. Due to his current project load he is not available to begin the project in the first or second quarter of 2022. I am planning to submit plans to the Parish for my new permitted residence in the third or fourth quarter of 2022.

On another note CWLNG informed FERC that they moved their pipeline right-of-way because a landowner requested them to move it. This increased the acreage of wetlands affected by the pipeline right-of-way by .1 acre. Ask CWLNG who the landowner was. What really happened is when I informed them that I would not sign their option agreement as presented until my land attorney reviewed it. I then asked to see the Cameron Port Harbor and Terminal Authority's (CPHTA) pipeline agreement with CWLNG. Louisiana law requires that the CPHTA must obtain an independent appraisal and make that information available for public review and comment.

The CPHTA did not show up at her office at the time published in the public notice and the independent appraisal was not available for review. She said she would send me a copy back in 2021 and I am still waiting. I asked who performed and paid for the appraisal. She stated it was CWLNG's contractor TRC and that CWLNG paid for the appraisal. I have copies of the public notice and emails to confirm my comments. They are available upon request. The same outfit that did the pipeline appraisal for CPHTA did my property appraisal for CWLNG.

IND17-1 Comment noted. See section 4.8.2.

IND17-2 Comment noted.

IND17-1

IND17-2

# INDIVIDUALS

## IND17- JOHN ALLAIRE

Document Accession #: 20220524-5020

Filed Date: 05/24/2022

In February of 2021 Mr. Karl Jansson VP for Commonwealth requested that I participate a conference call with himself and Mr. Paul Varelo with Commonwealth to discuss the possibility of purchasing my property. In their response to FERC they stated that "Mr. Allaire's property has been assessed to have a market value of \$385,000." I'm not sure who performed this assessment without visiting the property. My 311 acre tract of land includes all of Sections 26 and 27 in Township 15S range 10W. The property has approximately 3200' of frontage on the Gulf of Mexico and 2300' of frontage on the north and south sides of State HWY 27.

Improvements on the property include the previously mentioned pavilion, a permitted septic system, drinking water service and Jeff Davis electrical service, a permitted 290' deep 4"water well which is completed in the Chicot aquifer, 3500' of heavy industrial grade road which is double boarded with 36" of limestone and geotextile fabric and a 20,000 sq. /ft. 18" thick heavy industrial raised pad.

Recent property improvements after the hurricanes include complete replacement of all site electrical components and addition of 92 tons of limestone to the site roads to repair hurricane damage. Additionally, in April 2021 we completed a \$10,085.92 habitat improvement project at the site which was funded by Ducks Unlimited and USFW Partners for Fish and Wildlife Program. Cost estimates obtained this month for the replacement of the site roads and site pad are \$700,000 for the road and \$100,000 for the pad. The pavilion cost when built in 2018 was \$27,000. The water well cost was \$13,000 when installed in 2011. The utility infrastructure cost of replacement including permit fees would be approximately \$15,000.

Commonwealth misstated in their response to FERC that they offered me \$450,000 for my property. That is not accurate. They offered me \$40,000 to sign an option agreement to potentially purchase the property. Upon execution of this agreement they would then have the option to purchase the property at a price of \$400,000 at a future date. I would retain the \$40,000 option payment in the event that they decided not to purchase the land.

The Commonwealth offer was completely inadequate as the following local real estate listings detail:

MLS# 194304, 1.56 acres of land with frontage on State HWY 27 in Holly Beach. No property improvements, listed for \$1,000,000

MLS# SWL21003878, .46 acres of land in Pelican Beach Subdivision. No Gulf frontage or property improvements, listed for \$67,000

MLS# SLW21001345, .12 acres of land in Holly Beach. No gulf frontage but includes basic utilities, listed for \$69,000

MLS# 193271, 15 acres of Agricultural land in Johnson Bayou. North of State HWY 27, listed for \$137,500 for a cost of \$9,166 per acre

MLS# SWL21001142, .23 acres on the beach front. Vacant land listed for \$100,000

IND17-3    Comment noted.

IND17-3

Document Accession #: 20220524-5020

Filed Date: 05/24/2022

Thank you giving me an opportunity to correct and clarify some of the misleading and inaccurate statements Commonwealth has submitted to FERC with regard to myself and my secondary residence. I am concerned about consistent inaccuracies they have submitted to FERC regarding the purchase my property, how they assessed it and contesting my 2020 presence at my property. In my mind it still raises serious questions about the integrity of their filings and information provided elsewhere across the docket to FERC.

John Allaire

IND17-3

# INDIVIDUALS

## IND18- JOHN ALLAIRE

Document Accession #: 20220524-5201

Filed Date: 05/24/2022

Comments on Docket CP19-502-000 to FERC in response to Draft EIS Report (DEIS) Dated March 31, 2022. Comments with regard to tidally influenced areas affected by this project.

I am a local property owner whose residence is located directly west of the proposed project site. All of my 311 acres of coastal wetlands drain through main footprint of the proposed CWLNG site. I am a degreed professional with over thirty of experience in the environmental field. I have worked as an Environmental Engineer, Environmental Coordinator and an Environmental Manager for one of the world's largest Oil and Gas companies in the world. Over twenty years of career were spent working in Louisiana. My credentials are available upon request. Much of my property is tidally influenced and will be directly affected by the proposed project. I have been living at this site since 1998 and have observed the tidal action in this area for 24 years. The current mapping of area drainage plan and tidally influenced areas as presented in the DEIS are incomplete and inaccurate.

With regard to delineation of tidally influenced areas affected by this project FERC in a March 31, 2022 letter to NOAA NMFS the USACE stated the following: "As of March 31, 2022, the U.S. Army Corps of Engineers had not completed its official accounting of the acreage of wetlands that it considers to be tidally influenced at the LNG terminal site; therefore, the final acreage total of EFH that would be affected by construction of the Project could vary from that presented here." The DEIS presents to the sister agencies or the public "no official accounting of the acreage of wetlands that it considers to be tidally influenced at the LNG terminal site."

I contend that the amount of tidally influenced wetlands as currently presented in the DEIS is inaccurate and greatly underreported. In this DEIS the agencies have failed to disclose the extent of the tidally affected wetlands or the how the adjacent area drainage will not be disrupted. I conducted a limited study of the of the tidal elevations at the tidal drains that connect the water body identified on CWLNG wetland delineation maps as CO2 with the property south of State HWY 27. See the map below. The attached Power Point presentation shows the locations of the tidal drains located along HWY 27. These tidal drains are located under the road and provide tidal flow into the marsh south of Hwy 27. The SW tidal drain is located on Section 27 which adjoins section 28 of the proposed CWLNG project site. GPS coordinate of the SW and NE tidal drains are provided along with a photo of the SW tidal drain.

Slides 4 -7 in the PowerPoint presentation are date and time stamped and show the tidal levels at that moment in time. This series of photos detail the tidal elevation variations south of HWY 27 over the last 2 weeks. Additional photos and tidal elevations were collected and can be provided upon request. These tidal readings vary by as much as 10.16 inches over period of this study. CWLNG Figure 9, which is included in the Power Point presentation, details the Mean High Water elevations = to +.88' NAVD elevations that are flooded by high tide events. These events occur regularly at this site.

In addition the high tides this weekend over topped the gulf shore line dunes and flooded tidal water into water body SLO1 which is identified on the aforementioned wetland delineation map. Photos and videos can be provided upon request.

How can the public be expected to respond intelligently to the project's environmental affects if tidal information is not provide in this DEIS. I respectfully request at a minimum that FERC formally withdraw this incomplete DEIS until they can provide their sister agencies and the public with complete and accurate information related to this project.

Document Accession #: 20220524-5201

Filed Date: 05/24/2022

If FERC is unable to provide complete and accurate information with regard to the aforementioned issue I would respectfully request that FERC select the NO Action alternative for this project at this environmentally productive and sensitive area. Thank for your attention to this matter.

IND18 is a duplicate of IND16

# INDIVIDUALS

## IND19- CYBELE KNOWLES

Document Accession #: 20220523-0006

Filed Date: 05/23/2022



CENTER for BIOLOGICAL DIVERSITY

Because life is good.

May 18, 2022

ORIGINAL

Secretary Kimberly D. Bose  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, D.C. 20426

Dear Commissioners,

Enclosed please find 1,793 comments from Center for Biological Diversity supporters urging you to deny Commonwealth LNG's application for a new terminal and pipeline in Cameron Parish, Louisiana (CP19-502-000, CP19-502-001).

The project will destroy more than 30 acres of wetlands, which provide critically important habitat for federally protected eastern black rails. Noise and human activity associated with the construction and operation of the facility will likely further displace and disrupt black rails near the project site. As many as 30 birds may be killed or injured by the project. Meanwhile, eastern black rail populations in Louisiana and the southeast region are already facing significant threats. The U.S. Fish and Wildlife Service has determined that there may be only 10 or fewer breeding pairs left in the entire state and that the Southwest Coastal Plain population has "low resiliency" due to low populations threatened by sea-level rise and habitat loss. The species is likely to be extirpated in the United States by 2068 without implementation of better land-management practices. We can't afford to lose any more eastern black rails, especially when cleaner, more efficient, and less harmful alternatives clearly exist for this project.

In addition to destroying habitat for black rails and other wildlife, the pipeline will add to the climate emergency. Although natural gas is sometimes touted as a climate solution, its chief component — methane — is an especially potent climate pollutant that heats the atmosphere 87 times more than the same amount of carbon dioxide over a 20-year period.

Thank you for your attention to the enclosed letters.

For the wild,

Cybele Knowles  
Deputy Digital Director  
cknowles@biologicaldiversity.org  
(520) 623-5252 x 324

Enclosure: 1,793 letters

Alaska . Arizona . California . Florida . Minnesota . Nevada . New Mexico . New York . Oregon . Vermont . Washington, DC  
P.O. Box 710 . Tucson, AZ 85702-0710 tel: (520) 623.5252 fax: (520) 623.9797 www.BiologicalDiversity.org

IND19-1 Project impacts on wetlands and Commonwealth's proposed mitigation are discussed in section 4.4.2. Threatened and endangered species, including the eastern black rail, are addressed in section 4.7.

IND19-2 Impacts on threatened and endangered species, including the eastern black rail, are addressed in section 4.7.

IND19-3 See response to comment IND19-2.

IND19-4 See response to comment IND19-2.

IND19-5 Climate impacts of the Project discussed in section 4.13.2.11.

FERC received 1,793 copies of IND19 and IND20, which contain the same comments in different formats.

# INDIVIDUALS

## IND21- GAIL TUCKER

Document Accession #: 20220524-0081

Filed Date: 05/24/2022

Secretary Kimberly D. Bose  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, DC 20426

Dear Commissioners,

FILED  
SECRETARY OF THE  
COMMISSION  
2022 MAY 24 A II: 31  
FEDERAL ENERGY  
REGULATORY COMMISSION

I urge the Federal Energy Regulatory Commission to deny Commonwealth LNG's application for a new terminal and pipeline in Cameron Parish, Louisiana (CP19-502-000, CP19-502-001). The project will destroy more than 30 acres of wetlands, which provide critically important habitat for federally protected eastern black rails. Noise and human activity associated with the construction and operation of the facility will likely further displace and disrupt black rails near the project site. As many as 30 birds may be killed or injured by the project. Meanwhile, eastern black rail populations in Louisiana and the southeast region are already facing significant threats. The U.S. Fish and Wildlife Service has determined that there may be only 10 or fewer breeding pairs left in the entire state and that the Southwest Coastal Plain population has "low resiliency" due to low populations threatened by sea-level rise and habitat loss. The species is likely to be extirpated in the United States by 2068 without implementation of better land-management practices. On another point, the location along the Gulf is especially prone recently to severe hurricane conditions. It is reasonable to predict damage to the pipeline with massive releases of the methane contamination that will contribute significantly to the carbon footprint in that area and beyond as it is distributed by wind from any such tropical storm/hurricane conditions. We can't afford to lose any more eastern black rails, especially when cleaner, more efficient, and less harmful alternatives clearly exist for this project. In addition to destroying habitat for black rails and other wildlife, the pipeline will add to the climate emergency. Although natural gas is sometimes touted as a climate solution, its chief component — methane — is an especially potent climate pollutant that heats the atmosphere 87 times more than the same amount of carbon dioxide over a 20-year period. FERC must deny Commonwealth's application.

Sincerely,

Gail S. Tucker  
Miami, FL 33137

IND20-1

IND20-2

IND20-1 Project impacts on wetlands and Commonwealth's proposed mitigation are discussed in section 4.4.2. Threatened and endangered species, including the eastern black rail, are addressed in section 4.7.

IND20-2 Impacts of natural hazards on the Project are addressed in sections 4.1.5 and 4.12.1.5. Climate impacts are addressed in section 4.13.2.11.

# INDIVIDUALS

## IND21- RAMEET SINGH

Document Accession #: 20220527-0021 Filed Date: 05/27/2022

ORIGINAL

Rameet Singh  
Albuquerque, NM 87106

May 20, 2022

Federal Energy Regulatory Commission  
Secretary of the Commission, Kimberly D. Bose  
888 First St, NE, Washington, DC 20426

Re: Commonwealth LNG's Draft Environmental Impact Statement

FILED  
SECRETARY OF THE  
COMMISSION

2022 MAY 27 A 9:23  
FEDERAL ENERGY  
REGULATORY COMMISSION

CP19-502

Dear Commissioners,

I am writing to express my serious concerns regarding Commonwealth LNG's Draft Environmental Impact Statement - we simply cannot let this project be built. The people and fragile wetlands in Southwest Louisiana already suffer extreme impacts of the fossil fuel industry. Commonwealth LNG, and the 10 other export terminals proposed for the region, will result in irreparable harm and lock the world into a climate crisis. The Federal Energy Regulatory Commission must put people over corporate profits, and say no to Commonwealth LNG.

Commonwealth LNG will contribute significantly to the region's increasingly polluted air, which is already causing significant public health issues in Southwest Louisiana. There are four LNG terminals planned for the small community of Cameron, and the combined emissions would make the region uninhabitable.

In addition, the construction and operation of Commonwealth LNG would result in the destruction of valuable wetlands where federally endangered and threatened species like the Eastern Black Rail and Piping Plover nest. The increased ship traffic will put the Gulf's Rice's Whale, Bottlenose Dolphin, and other federally threatened and endangered species at risk of marine pollution and ship strikes.

Commonwealth LNG will also be located in an extremely vulnerable section of shoreline. Hurricanes hit this region with greater frequency and force, a problem that will only get worse as our climate continues to warm. In recent years, the community of Cameron has recorded 12-14 foot storm surges and the shoreline is eroding away at an average of 13 feet per year. This is a dangerous location for a fracked gas export terminal and all of the hazardous waste and gas that will contaminate the region when the facility is compromised.

Finally, Southwest Louisiana is already among the most impacted in the country by climate change. Communities like Cameron, once a thriving fishing community of 10,000 people, have seen most of their residents migrate due to climate disasters. The construction of even more fracked gas export terminals will lock the world into irreversible climate disaster, and render Southwestern Louisiana uninhabitable.

Commonwealth LNG is using the Russian-Ukraine conflict and Europe's energy needs to justify their project. The U.S. already has enough gas export infrastructure to satisfy Europe's demand for gas. We don't need to export more gas to satisfy global needs. In fact, Commonwealth LNG would not come online for at least three more years and would contribute nothing to Europe's current energy needs.

This proposal does not benefit domestic consumers and it damages essential wetlands. Please do not put the profits a big business in front of our planet in our people.

We cannot allow the fossil fuel industry to sacrifice our Gulf just to export gas. Our environment and human populations are too high a price to pay.

Sincerely,  
Rameet Singh

IND21-1

IND21-2

IND21-3

IND21-4

IND21-5

IND21-6

IND21-1 Climate Impacts of the Project are discussed in section 4.13.2.11.

IND21-2 Impacts on air quality are addressed in section 4.11.1.

IND21-3 Impacts on threatened and endangered species and marine mammals are discussed in sections 4.6.2 and 4.7.1.

IND21-4 Safety of the Terminal is discussed in section 4.12.1.

IND21-5 Socioeconomic impacts of the Project are discussed throughout section 4.9; Climate Impacts of the Project are discussed in section 4.13.2.11.

IND21-6 The Purpose and Need of the Project is discussed in section 1.1; impacts on coastal wetlands are discussed in section 4.4.

FERC received 597 copies of IND21. Some versions of this letter contained unique and substantive comments in the seventh paragraph. These are included below.

# INDIVIDUALS

## IND22- ELLEN JO RUDOLPH

Document Accession #: 20220527-0008

Filed Date: 05/27/2022

Jo Ellen Rudolph  
Petoskey, MI 49770

ORIGINAL

FILED  
SECRETARY OF THE  
COMMISSION

2022 MAY 27 A 8:26

FEDERAL ENERGY  
REGULATORY COMMISSION

CP19-502

May 20, 2022

Federal Energy Regulatory Commission  
Secretary of the Commission, Kimberly D. Bose  
888 First St, NE, Washington, DC 20426  
Re: Commonwealth LNG's Draft Environmental Impact Statement

Dear Commissioners,

I am writing to express my serious concerns regarding Commonwealth LNG's Draft Environmental Impact Statement - we simply cannot let this project be built. The people and fragile wetlands in Southwest Louisiana already suffer extreme impacts of the fossil fuel industry. Commonwealth LNG, and the 10 other export terminals proposed for the region, will result in irreparable harm and lock the world into a climate crisis. The Federal Energy Regulatory Commission must put people over corporate profits, and say no to Commonwealth LNG.

Commonwealth LNG will contribute significantly to the region's increasingly polluted air, which is already causing significant public health issues in Southwest Louisiana. There are four LNG terminals planned for the small community of Cameron, and the combined emissions would make the region uninhabitable.

In addition, the construction and operation of Commonwealth LNG would result in the destruction of valuable wetlands where federally endangered and threatened species like the Eastern Black Rail and Piping Plover nest. The increased ship traffic will put the Gulf's Rice's Whale, Bottlenose Dolphin, and other federally threatened and endangered species at risk of marine pollution and ship strikes.

Commonwealth LNG will also be located in an extremely vulnerable section of shoreline. Hurricanes hit this region with greater frequency and force, a problem that will only get worse as our climate continues to warm. In recent years, the community of Cameron has recorded 12-14 foot storm surges and the shoreline is eroding away at an average of 13 feet per year. This is a dangerous location for a fracked gas export terminal and all of the hazardous waste and gas that will contaminate the region when the facility is compromised.

Finally, Southwest Louisiana is already among the most impacted in the country by climate change. Communities like Cameron, once a thriving fishing community of 10,000 people, have seen most of their residents migrate due to climate disasters. The construction of even more fracked gas export terminals will lock the world into irreversible climate disaster, and render Southwestern Louisiana uninhabitable.

Commonwealth LNG is using the Russian-Ukraine conflict and Europe's energy needs to justify their project. The U.S. already has enough gas export infrastructure to satisfy Europe's demand for gas. We don't need to export more gas to satisfy global needs. In fact, Commonwealth LNG would not come online for at least three more years and would contribute nothing to Europe's current energy needs.

THIS AREA ALREADY HAS TOO MUCH POLLUTION AND ENVIRONMENTAL INJUSTICE. THE GULF IS ALSO A VERY DAMAGED AREA FROM THE BP OIL SPILL. OCEAN MAMMAL SPECIES AND COMMERCIAL CRUSTACEAN SUPPLIES HAVE NOT REBOUNDED. OCEAN MAMMALS HAVE BEEN FOUND WITH PHYSICAL DEFORMITIES. THE OCEAN BOTTOM STILL HAS OIL SLUDGE WHICH WILL POLLUTE THE AREA FOREVER. THE OCEAN DOES NOT NEED MORE POLLUTING INDUSTRIES ESPECIALLY AN INDUSTRY THAT WILL ONLY SEND POLLUTING AMERICAN LP GAS OVERSEAS.

We cannot allow the fossil fuel industry to sacrifice our Gulf just to export gas. Our environment and human populations are too high a price to pay.

Sincerely, Jo Ellen Rudolph

IND22-1

The impacts of the Project on Environmental Justice communities are discussed in section 4.9.12.3. The impacts of the Project on Air Quality are discussed in section 4.11.1. The Impacts of the Project on aquatic resources are discussed in section 4.6.2

IND22-1

# INDIVIDUALS

## IND23- MARY BARR

Document Accession #: 20220527-0008

Filed Date: 05/27/2022

Mary Barr  
Indianapolis, IN 46219

May 20, 2022

Federal Energy Regulatory Commission  
Secretary of the Commission, Kimberly D. Bose  
888 First St, NE, Washington, DC 20426  
Re: Commonwealth LNG's Draft Environmental Impact Statement

Dear Commissioners,

I am writing to express my serious concerns regarding Commonwealth LNG's Draft Environmental Impact Statement - we simply cannot let this project be built. The people and fragile wetlands in Southwest Louisiana already suffer extreme impacts of the fossil fuel industry. Commonwealth LNG, and the 10 other export terminals proposed for the region, will result in irreparable harm and lock the world into a climate crisis. The Federal Energy Regulatory Commission must put people over corporate profits, and say no to Commonwealth LNG.

Commonwealth LNG will contribute significantly to the region's increasingly polluted air, which is already causing significant public health issues in Southwest Louisiana. There are four LNG terminals planned for the small community of Cameron, and the combined emissions would make the region uninhabitable.

In addition, the construction and operation of Commonwealth LNG would result in the destruction of valuable wetlands where federally endangered and threatened species like the Eastern Black Rail and Piping Plover nest. The increased ship traffic will put the Gulf's Rice's Whale, Bottlenose Dolphin, and other federally threatened and endangered species at risk of marine pollution and ship strikes.

Commonwealth LNG will also be located in an extremely vulnerable section of shoreline. Hurricanes hit this region with greater frequency and force, a problem that will only get worse as our climate continues to warm. In recent years, the community of Cameron has recorded 12-14 foot storm surges and the shoreline is eroding away at an average of 13 feet per year. This is a dangerous location for a fracked gas export terminal and all of the hazardous waste and gas that will contaminate the region when the facility is compromised.

Finally, Southwest Louisiana is already among the most impacted in the country by climate change. Communities like Cameron, once a thriving fishing community of 10,000 people, have seen most of their residents migrate due to climate disasters. The construction of even more fracked gas export terminals will lock the world into irreversible climate disaster, and render Southwestern Louisiana uninhabitable.

Commonwealth LNG is using the Russian-Ukraine conflict and Europe's energy needs to justify their project. The U.S. already has enough gas export infrastructure to satisfy Europe's demand for gas. We don't need to export more gas to satisfy global needs. In fact, Commonwealth LNG would not come online for at least three more years and would contribute nothing to Europe's current energy needs.

The residents living in the Gulf area have lost businesses over the past years, even decades, due to big oil and gas companies taking over and resulting in loss of fishing rights, loss of damage done to people's livelihoods. Families not only are losing their jobs but the health and welfare of their children. Do not give into big business of Commonwealth LNG intending to add to more ruin of lives and climate issues in its endeavors to get its foothold in Cameron. This big company has a history of impacting climate change negatively.

We cannot allow the fossil fuel industry to sacrifice our Gulf just to export gas. Our environment and human populations are too high a price to pay.

Sincerely,  
Mary Barr

CP19-502  
FILED  
SECRETARY OF THE  
COMMISSION

2022 MAY 27 A 8:27

FEDERAL ENERGY  
REGULATORY COMMISSION

IND23-1

Impacts of the Project on the local economy are addressed throughout section 4.9. Climate impacts of the Project discussed in section 4.13.2.11.

IND23-1

# INDIVIDUALS

## IND24- JOHN ALLAIRE

Document Accession #: 20220527-0008

Filed Date: 05/27/2022

Rosenberg, TX 77471

CP19-502

May 20, 2022

Federal Energy Regulatory Commission  
Secretary of the Commission, Kimberly D. Bose  
888 First St, NE, Washington, DC 20426  
Re: Commonwealth LNG's Draft Environmental Impact Statement

FILED  
SECRETARY OF THE  
COMMISSION

2022 MAY 27 A 8:27  
FEDERAL ENERGY  
REGULATORY COMMISSION

Dear Commissioners,

I am writing to express my serious concerns regarding Commonwealth LNG's Draft Environmental Impact Statement - we simply cannot let this project be built. The people and fragile wetlands in Southwest Louisiana already suffer extreme impacts of the fossil fuel industry. Commonwealth LNG, and the 10 other export terminals proposed for the region, will result in irreparable harm and lock the world into a climate crisis. The Federal Energy Regulatory Commission must put people over corporate profits, and say no to Commonwealth LNG.

Commonwealth LNG will contribute significantly to the region's increasingly polluted air, which is already causing significant public health issues in Southwest Louisiana. There are four LNG terminals planned for the small community of Cameron, and the combined emissions would make the region uninhabitable.

In addition, the construction and operation of Commonwealth LNG would result in the destruction of valuable wetlands where federally endangered and threatened species like the Eastern Black Rail and Piping Plover nest. The increased ship traffic will put the Gulf's Rice's Whale, Bottlenose Dolphin, and other federally threatened and endangered species at risk of marine pollution and ship strikes.

Commonwealth LNG will also be located in an extremely vulnerable section of shoreline. Hurricanes hit this region with greater frequency and force, a problem that will only get worse as our climate continues to warm. In recent years, the community of Cameron has recorded 12-14 foot storm surges and the shoreline is eroding away at an average of 13 feet per year. This is a dangerous location for a fracked gas export terminal and all of the hazardous waste and gas that will contaminate the region when the facility is compromised.

Finally, Southwest Louisiana is already among the most impacted in the country by climate change. Communities like Cameron, once a thriving fishing community of 10,000 people, have seen most of their residents migrate due to climate disasters. The construction of even more fracked gas export terminals will lock the world into irreversible climate disaster, and render Southwestern Louisiana uninhabitable.

Commonwealth LNG is using the Russian-Ukraine conflict and Europe's energy needs to justify their project. The U.S. already has enough gas export infrastructure to satisfy Europe's demand for gas. We don't need to export more gas to satisfy global needs. In fact, Commonwealth LNG would not come online for at least three more years and would contribute nothing to Europe's current energy needs.

There is no need for another LNG export facility in Cameron Parish. I am a resident of Hackberry, La. and have already seen the effects of the Cameron and Global Venture facilities on our fishing, shrimping; crabbing industries as well as the destruction of our coastal wetlands which support migratory birds and waterfowl. Please deny the Commonwealth LNG permit. It will only destroy more!!!  
Hank Gamble

We cannot allow the fossil fuel industry to sacrifice our Gulf just to export gas. Our environment and human populations are too high a price to pay.

Sincerely,  
John Allaire

IND24-1 Impacts of the Project on commercial fisheries are addressed in section 4.9.7. Impacts and mitigation related to coastal wetlands are addressed in section 4.4 and 4.6.2.

IND24-1

# INDIVIDUALS

## IND25- TOM ADLER

Document Accession #: 20220527-0008

Filed Date: 05/27/2022

Tom Adler  
River Ridge, LA 70123

May 20, 2022

Federal Energy Regulatory Commission  
Secretary of the Commission, Kimberly D. Bose  
888 First St, NE, Washington, DC 20426

Re: Commonwealth LNG's Draft Environmental Impact Statement

Dear Commissioners,

I am writing to express my serious concerns regarding Commonwealth LNG's Draft Environmental Impact Statement - we simply cannot let this project be built. The people and fragile wetlands in Southwest Louisiana already suffer extreme impacts of the fossil fuel industry. Commonwealth LNG, and the 10 other export terminals proposed for the region, will result in irreparable harm and lock the world into a climate crisis. The Federal Energy Regulatory Commission must put people over corporate profits, and say no to Commonwealth LNG.

Commonwealth LNG will contribute significantly to the region's increasingly polluted air, which is already causing significant public health issues in Southwest Louisiana. There are four LNG terminals planned for the small community of Cameron, and the combined emissions would make the region uninhabitable.

In addition, the construction and operation of Commonwealth LNG would result in the destruction of valuable wetlands where federally endangered and threatened species like the Eastern Black Rail and Piping Plover nest. The increased ship traffic will put the Gulf's Rice's Whale, Bottlenose Dolphin, and other federally threatened and endangered species at risk of marine pollution and ship strikes.

Commonwealth LNG will also be located in an extremely vulnerable section of shoreline. Hurricanes hit this region with greater frequency and force, a problem that will only get worse as our climate continues to warm. In recent years, the community of Cameron has recorded 12-14 foot storm surges and the shoreline is eroding away at an average of 13 feet per year. This is a dangerous location for a fracked gas export terminal and all of the hazardous waste and gas that will contaminate the region when the facility is compromised.

Finally, Southwest Louisiana is already among the most impacted in the country by climate change. Communities like Cameron, once a thriving fishing community of 10,000 people, have seen most of their residents migrate due to climate disasters. The construction of even more fracked gas export terminals will lock the world into irreversible climate disaster, and render Southwestern Louisiana uninhabitable.

Commonwealth LNG is using the Russian-Ukraine conflict and Europe's energy needs to justify their project. The U.S. already has enough gas export infrastructure to satisfy Europe's demand for gas. We don't need to export more gas to satisfy global needs. In fact, Commonwealth LNG would not come online for at least three more years and would contribute nothing to Europe's current energy needs.

The carbon footprint of exporting LNG is as much as burning of LNG itself (see: Sailing To Nowhere: Liquefied Natural Gas Is Not An Effective Climate Strategy, NRDC Dec. 2020) If we are to reduce our GHG emissions we must begin now to curtail the number of LNG export ports, especially since there are so many already permitted by FERC

We cannot allow the fossil fuel industry to sacrifice our Gulf just to export gas. Our environment and human populations are too high a price to pay.

Sincerely,  
Tom Adler

CP19-502  
FILED  
SECRETARY OF THE  
COMMISSION

2022 MAY 27 A 8:27

FEDERAL ENERGY  
REGULATORY COMMISSION

IND25-1 Climate impacts of the Project discussed in section 4.13.2.11.

IND25-1

# INDIVIDUALS

## IND26- HOLLY PAQUETTE

Document Accession #: 20220527-0008

Filed Date: 05/27/2022

CP19-502

Holly Paquette  
Houston, TX 77077

May 20, 2022

Federal Energy Regulatory Commission  
Secretary of the Commission, Kimberly D. Bose  
888 First St, NE, Washington, DC 20426

Re: Commonwealth LNG's Draft Environmental Impact Statement

FILED  
SECRETARY OF THE  
COMMISSION

2022 MAY 27 A 8:28

FEDERAL ENERGY  
REGULATORY COMMISSION

Dear Commissioners,

I am writing to express my serious concerns regarding Commonwealth LNG's Draft Environmental Impact Statement - we simply cannot let this project be built. The people and fragile wetlands in Southwest Louisiana already suffer extreme impacts of the fossil fuel industry. Commonwealth LNG, and the 10 other export terminals proposed for the region, will result in irreparable harm and lock the world into a climate crisis. The Federal Energy Regulatory Commission must put people over corporate profits, and say no to Commonwealth LNG.

Commonwealth LNG will contribute significantly to the region's increasingly polluted air, which is already causing significant public health issues in Southwest Louisiana. There are four LNG terminals planned for the small community of Cameron, and the combined emissions would make the region uninhabitable.

In addition, the construction and operation of Commonwealth LNG would result in the destruction of valuable wetlands where federally endangered and threatened species like the Eastern Black Rail and Piping Plover nest. The increased ship traffic will put the Gulf's Rice's Whale, Bottlenose Dolphin, and other federally threatened and endangered species at risk of marine pollution and ship strikes.

Commonwealth LNG will also be located in an extremely vulnerable section of shoreline. Hurricanes hit this region with greater frequency and force, a problem that will only get worse as our climate continues to warm. In recent years, the community of Cameron has recorded 12-14 foot storm surges and the shoreline is eroding away at an average of 13 feet per year. This is a dangerous location for a fracked gas export terminal and all of the hazardous waste and gas that will contaminate the region when the facility is compromised.

Finally, Southwest Louisiana is already among the most impacted in the country by climate change. Communities like Cameron, once a thriving fishing community of 10,000 people, have seen most of their residents migrate due to climate disasters. The construction of even more fracked gas export terminals will lock the world into irreversible climate disaster, and render Southwestern Louisiana uninhabitable.

Commonwealth LNG is using the Russian-Ukraine conflict and Europe's energy needs to justify their project. The U.S. already has enough gas export infrastructure to satisfy Europe's demand for gas. We don't need to export more gas to satisfy global needs. In fact, Commonwealth LNG would not come online for at least three more years and would contribute nothing to Europe's current energy needs.

The Gulf Coast is my home and we are constantly under attack either from weather or from those who put short-term gains over long-term livability. I have grown up around oil and gas and it's many projects. Given the negative impacts it has had on my own life via health consequences, losses of home and livelihood every time the market busts and negligent management of pipelines and rampant flares in gas fields, I know for a fact this will be NO different. I want a livable place for my kids. Please reconsider the cost expect us to pay. I just can't pay any more.

We cannot allow the fossil fuel industry to sacrifice our Gulf just to export gas. Our environment and human populations are too high a price to pay.

Sincerely,  
Holly Paquette

IND26-1

Comment noted. We reiterate that the final EIS is not a decision document. It is produced to inform the Commission of the potential impacts associated with construction and operation of the proposed Project.

# INDIVIDUALS

## IND27- BRAD SNYDER

Document Accession #: 20220527-0010

Filed Date: 05/27/2022

Brad Snyder  
Maple Grove, MN 55369

May 20, 2022

Federal Energy Regulatory Commission  
Secretary of the Commission, Kimberly D. Bose  
888 First St, NE, Washington, DC 20426

Re: Commonwealth LNG's Draft Environmental Impact Statement

Dear Commissioners,

I am writing to express my serious concerns regarding Commonwealth LNG's Draft Environmental Impact Statement - we simply cannot let this project be built. The people and fragile wetlands in Southwest Louisiana already suffer extreme impacts of the fossil fuel industry. Commonwealth LNG, and the 10 other export terminals proposed for the region, will result in irreparable harm and lock the world into a climate crisis. The Federal Energy Regulatory Commission must put people over corporate profits, and say no to Commonwealth LNG.

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As a Science Teacher/Environmental Educator, former Mechanical Engineer, and a Climate Change/Human Health/Environmental & Natural World Protection Advocate, I wholeheartedly insist FERC to oppose LNG export facilities in the Gulf!! To fight pollution and climate change, and improve human health and environmental quality, we MUST continue to eliminate our dependence on fossil fuels and prepare for the Renewable Energy Revolution (which has already started)!! Building new LNG export terminals will extend our use of fossil fuels for decades to come when the world is trying to fight a Global Climate Crisis!! We MUST stop the development of ALL fossil fuel infrastructure NOW in order to transition away from dirty fuels to benefit ALL life on Earth!! Thanks!

We cannot allow the fossil fuel industry to sacrifice our Gulf just to export gas. Our environment and human populations are too high a price to pay.

Sincerely,  
Brad Snyder

CP19-S02  
FILED  
SECRETARY OF THE  
COMMISSION

2022 MAY 27 A F 27

FEDERAL ENERGY  
REGULATORY COMMISSION

IND27-1 Climate impacts of the Project discussed in section 4.13.2.11.

IND27-1

# INDIVIDUALS

## IND28-LINDA FAUCHEUX

Document Accession #: 20220527-0010

Filed Date: 05/27/2022

Linda Faucheux  
New Orleans, LA 70130

CP19-S02

FILED  
SECRETARY OF THE  
COMMISSION

2022 MAY 27 A 7:27

FEDERAL ENERGY  
REGULATORY COMMISSION

May 20, 2022

Federal Energy Regulatory Commission  
Secretary of the Commission, Kimberly D. Bose  
888 First St, NE, Washington, DC 20426

Re: Commonwealth LNG's Draft Environmental Impact Statement

Dear Commissioners,

I am writing to express my serious concerns regarding Commonwealth LNG's Draft Environmental Impact Statement - we simply cannot let this project be built. The people and fragile wetlands in Southwest Louisiana already suffer extreme impacts of the fossil fuel industry. Commonwealth LNG, and the 10 other export terminals proposed for the region, will result in irreparable harm and lock the world into a climate crisis. The Federal Energy Regulatory Commission must put people over corporate profits, and say no to Commonwealth LNG.

Commonwealth LNG will contribute significantly to the region's increasingly polluted air, which is already causing significant public health issues in Southwest Louisiana. There are four LNG terminals planned for the small community of Cameron, and the combined emissions would make the region uninhabitable.

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Commonwealth LNG is using the Russian-Ukraine conflict and Europe's energy needs to justify their project. The U.S. already has enough gas export infrastructure to satisfy Europe's demand for gas. We don't need to export more gas to satisfy global needs. In fact, Commonwealth LNG would not come online for at least three more years and would contribute nothing to Europe's current energy needs.

As a Louisiana native and resident, I write to urge you to call a halt to any further spoliation of Louisiana lands, and particularly those in and around the town of Cameron. Further degradation of the wetlands and coastlands in that area through the construction of even more fossil fuel export terminals can only exacerbate an already dangerous loss of wetlands, the only existing natural barrier to storm surges. Such terminals pose an additional direct threat to the health of area residents and workers through the pollution of air, land, and water, resources that exist under Louisiana law for the benefit of all citizens and which, once rendered harmful rather than healthful, cannot be restored or replaced. Do not sacrifice the health and lives of the inhabitants and workers of what was a bountiful environment for the financial gain of corporations. You have the power to stop the destruction now threatening southwest Louisiana and her coastlands. Please use it for the good..

We cannot allow the fossil fuel industry to sacrifice our Gulf just to export gas. Our environment and human populations are too high a price to pay.

Sincerely,  
Linda Faucheux

IND28-1

Impacts and mitigation related to coastal wetlands and waters are addressed in sections 4.3.2, 4.4, and 4.6.2; impacts on air quality are addressed in section 4.11.1.

IND28-1

# INDIVIDUALS

## IND29-DAVID SACERDOTE

Document Accession #: 20220527-0011

Filed Date: 05/27/2022

David Sacerdote  
Palo Alto, CA 94306

May 20, 2022

Federal Energy Regulatory Commission  
Secretary of the Commission, Kimberly D. Bose  
888 First St, NE, Washington, DC 20426

Re: Commonwealth LNG's Draft Environmental Impact Statement

Dear Commissioners,

I am writing to express my serious concerns regarding Commonwealth LNG's Draft Environmental Impact Statement - we simply cannot let this project be built. The people and fragile wetlands in Southwest Louisiana already suffer extreme impacts of the fossil fuel industry. Commonwealth LNG, and the 10 other export terminals proposed for the region, will result in irreparable harm and lock the world into a climate crisis. The Federal Energy Regulatory Commission must put people over corporate profits, and say no to Commonwealth LNG.

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Commonwealth LNG is using the Russian-Ukraine conflict and Europe's energy needs to justify their project. The U.S. already has enough gas export infrastructure to satisfy Europe's demand for gas. We don't need to export more gas to satisfy global needs. In fact, Commonwealth LNG would not come online for at least three more years and would contribute nothing to Europe's current energy needs.

Exporting additional LNG will raise US prices to match the much higher ones on the international market, and result in additional fracking and extraction throughout the US. Due to the significant leakage throughout the extraction and transportation process, this will release significant methane into the atmosphere, in addition to the CO2 released when the additional LNG is burned. New projects of this type also have a lifetime of 30 years or more, which is inconsistent with US pledges to achieve net zero greenhouse gas emissions by 2050.

We cannot allow the fossil fuel industry to sacrifice our Gulf just to export gas. Our environment and human populations are too high a price to pay.

Sincerely,  
David Sacerdote

FILED  
SECRETARY OF THE  
COMMISSION

2022 MAY 21 A 7:28

FEDERAL ENERGY  
REGULATORY COMMISSION

CP19-502

IND29-1

IND29-1

Climate impacts of the Project discussed in section 4.13.2.11.

# INDIVIDUALS

## IND30- BEN GORDON

Document Accession #: 20220527-0011

Filed Date: 05/27/2022

Ben Gordon  
New Orleans, LA 70172

May 20, 2022

Federal Energy Regulatory Commission  
Secretary of the Commission, Kimberly D. Bose  
888 First St, NE, Washington, DC 20426

Re: Commonwealth LNG's Draft Environmental Impact Statement

Dear Commissioners,

I am writing to express my serious concerns regarding Commonwealth LNG's Draft Environmental Impact Statement - we simply cannot let this project be built. The people and fragile wetlands in Southwest Louisiana already suffer extreme impacts of the fossil fuel industry. Commonwealth LNG, and the 10 other export terminals proposed for the region, will result in irreparable harm and lock the world into a climate crisis. The Federal Energy Regulatory Commission must put people over corporate profits, and say no to Commonwealth LNG.

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Do we really need another Gas Export Terminal in Louisiana if we are trying to be less dependent on fossil fuels in a renewable energy future? Climate change is already decimating coastal communities with frequent storms and sea level rise. Communities that existed for generations on fishing, shrimping, crabbing, etc. These communities lived in harmony with nature for generations. Please do not give the green light for this terminal!

We cannot allow the fossil fuel industry to sacrifice our Gulf just to export gas. Our environment and human populations are too high a price to pay.

Sincerely,  
Ben Gordon

FILED  
SECRETARY OF THE  
COMMISSION

2022 MAY 27 A 7:28

FEDERAL ENERGY  
REGULATORY COMMISSION

CP19-502

IND30-1 Climate impacts of the Project discussed in section 4.13.2.11.

IND30-1

# INDIVIDUALS

## IND31- BETTY DUSON

Document Accession #: 20220527-0011

Filed Date: 05/27/2022

Betty Duson  
Houston, TX 77030

May 20, 2022

Federal Energy Regulatory Commission  
Secretary of the Commission, Kimberly D. Bose  
888 First St, NE, Washington, DC 20426

Re: Commonwealth LNG's Draft Environmental Impact Statement

Dear Commissioners,

I am writing to express my serious concerns regarding Commonwealth LNG's Draft Environmental Impact Statement - we simply cannot let this project be built. The people and fragile wetlands in Southwest Louisiana already suffer extreme impacts of the fossil fuel industry. Commonwealth LNG, and the 10 other export terminals proposed for the region, will result in irreparable harm and lock the world into a climate crisis. The Federal Energy Regulatory Commission must put people over corporate profits, and say no to Commonwealth LNG.

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Do not risk pollution and destruction of this beautiful area. Instead put your resources toward the development of wind and solar energy and stand on the right side of history. Would you toss a burning match into Texas's Piney Woods? How is what you're planning any better for our planet?

We cannot allow the fossil fuel industry to sacrifice our Gulf just to export gas. Our environment and human populations are too high a price to pay.

Sincerely,  
Betty Duson

FILED  
SECRETARY OF THE  
COMMISSION  
2022 MAY 27 A 7:28  
FEDERAL ENERGY  
REGULATORY COMMISSION  
CPI9-502

IND31-1 Climate Impacts of the Project are discussed in section 4.13.2.11

IND31-1

# INDIVIDUALS

## IND32- BEATRICE ELKLEBERRY

Document Accession #: 20220527-0011

Filed Date: 05/27/2022

Beatrice Elkleberry  
Denver, CO 80123

May 20, 2022

Federal Energy Regulatory Commission  
Secretary of the Commission, Kimberly D. Bose  
888 First St, NE, Washington, DC 20426

Re: Commonwealth LNG's Draft Environmental Impact Statement

Dear Commissioners,

I am writing to express my serious concerns regarding Commonwealth LNG's Draft Environmental Impact Statement - we simply cannot let this project be built. The people and fragile wetlands in Southwest Louisiana already suffer extreme impacts of the fossil fuel industry. Commonwealth LNG, and the 10 other export terminals proposed for the region, will result in irreparable harm and lock the world into a climate crisis. The Federal Energy Regulatory Commission must put people over corporate profits, and say no to Commonwealth LNG.

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Commonwealth LNG is using the Russian-Ukraine conflict and Europe's energy needs to justify their project. The U.S. already has enough gas export infrastructure to satisfy Europe's demand for gas. We don't need to export more gas to satisfy global needs. In fact, Commonwealth LNG would not come online for at least three more years and would contribute nothing to Europe's current energy needs.

Dear Federal Energy Regulatory Commission,  
I am deeply concerned about the Commonwealth LNG project. Our world is in a climate crisis, and our country is a leading offender in that crisis. We live in an interdependent world, and we need to protect the water and air, the natural resources and wildlife, the people here and across the world, so that the delicate web of life can flourish and our children can thrive. How can we turn our heads, line our pockets, and repeatedly postpone action when the survival of our species is at stake? Fires already are raging, hundreds of thousands of plant and animal species already are endangered or extinct, and temperatures in Eastern Antarctica are 70 degrees higher than normal. You have the opportunity as leaders to take action to turn the tide. Please consider the interdependence of life, protect planet and not profit, and say no to Commonwealth LNG.

We cannot allow the fossil fuel industry to sacrifice our Gulf just to export gas. Our environment and human populations are too high a price to pay.

Sincerely,  
Beatrice Elkleberry

FILED  
SECRETARY OF THE  
COMMISSION  
2022 MAY 27 A 7:28  
FEDERAL ENERGY  
REGULATORY COMMISSION  
CP19-502

IND32-1

Climate Impacts of the Project are discussed in section 4.13.2.11.

# INDIVIDUALS

## IND33- NANCY CAMEL

Document Accession #: 20220527-0020

Filed Date: 05/27/2022

Nancy Camel  
Baton Rouge, LA 70810

May 20, 2022

Federal Energy Regulatory Commission  
Secretary of the Commission, Kimberly D. Bose  
888 First St, NE, Washington, DC 20426

Re: Commonwealth LNG's Draft Environmental Impact Statement

Dear Commissioners,

I am writing to express my serious concerns regarding Commonwealth LNG's Draft Environmental Impact Statement - we simply cannot let this project be built. The people and fragile wetlands in Southwest Louisiana already suffer extreme impacts of the fossil fuel industry. Commonwealth LNG, and the 10 other export terminals proposed for the region, will result in irreparable harm and lock the world into a climate crisis. The Federal Energy Regulatory Commission must put people over corporate profits, and say no to Commonwealth LNG.

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Commonwealth LNG is using the Russian-Ukraine conflict and Europe's energy needs to justify their project. The U.S. already has enough gas export infrastructure to satisfy Europe's demand for gas. We don't need to export more gas to satisfy global needs. In fact, Commonwealth LNG would not come online for at least three more years and would contribute nothing to Europe's current energy needs.

Southwest Louisiana and Eastern Texas is a migratory bird sanctuary where they rest after long flights! These avians must be protected. Also, countless shrimpers and other fishermen make their livings in that area. Please no LNG Commonwealth!

We cannot allow the fossil fuel industry to sacrifice our Gulf just to export gas. Our environment and human populations are too high a price to pay.

Sincerely,  
Nancy Camel

FILED  
SECRETARY OF THE  
COMMISSION  
2022 MAY 27 A 8:32  
FEDERAL ENERGY  
REGULATORY COMMISSION

IND33-1      Impacts on migratory birds are discussed in section 4.6.1.3; impacts on commercial fisheries are discussed in section 4.9.7.

IND33-1

# INDIVIDUALS

## IND34- MARGARET GOODMAN

Document Accession #: 20220527-0021

Filed Date: 05/27/2022

Margaret Goodman  
Blanco, TX 78606

May 20, 2022

Federal Energy Regulatory Commission  
Secretary of the Commission, Kimberly D. Bose  
888 First St, NE, Washington, DC 20426

Re: Commonwealth LNG's Draft Environmental Impact Statement

FILED  
SECRETARY OF THE  
COMMISSION

2022 MAY 27 A 9:23

FEDERAL ENERGY  
REGULATORY COMMISSION

CP19-502

Dear Commissioners,

I am writing to express my serious concerns regarding Commonwealth LNG's Draft Environmental Impact Statement - we simply cannot let this project be built. The people and fragile wetlands in Southwest Louisiana already suffer extreme impacts of the fossil fuel industry. Commonwealth LNG, and the 10 other export terminals proposed for the region, will result in irreparable harm and lock the world into a climate crisis. The Federal Energy Regulatory Commission must put people over corporate profits, and say no to Commonwealth LNG.

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We must all work together to do everything possible to slow the effects of climate change. **This project will harm the livelihood of fishermen and the health of people living in the area and the quality of our water.** It is time to understand these things are more important than another export terminal.

Thank you.

We cannot allow the fossil fuel industry to sacrifice our Gulf just to export gas. Our environment and human populations are too high a price to pay.

Sincerely,  
Margaret Goodman

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The Purpose and Need of the Project are discussed in section 1.1. Impacts on local water quality are discussed in section 4.3; socioeconomic impacts of the Project are discussed throughout section 4.9; and climate Impacts of the Project are discussed in section 4.13.2.11.

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