

PUBLIC SUBMISSION

As of: 7/12/22 3:24 PM Received: May 26, 2022 Status: Pending_Post Tracking No. l3n-o8x4-xgi6 Comments Due: July 11, 2022 Submission Type: API

Docket: DOE-HQ-2022-0020

Importation or Exportation of Liquified Natural Gas or Electric Energy; Applications, Authorizations, etc.: New Fortress Energy Louisiana FLNG, LLC

Comment On: DOE-HQ-2022-0020-0001

Importation or Exportation of Liquified Natural Gas or Electric Energy; Applications, Authorizations, etc.: New Fortress Energy Louisiana FLNG, LLC

Document: DOE-HQ-2022-0020-DRAFT-0002

Comment on FR Doc # 2022-10168

Submitter Information

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Organization: Fenceline Watch

General Comment

See attached file(s)

Attachments

New Fortress FLNG LLC MARAD-2022-0076



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*Submitted electronically:
www.regulations.gov*

Federal Docket Management Facility
Dock Number: MARAD-2022-0076
U.S. Department of Transportation
West Building, Ground Floor
Room W12-140
1200 New Jersey Avenue SE
Washington, DC 20590-0001

**Re: Comments on New Fortress Energy Louisiana FLNG, LLC, Deepwater Port License
Application Docket No. MARAD–2022–0076**

I am the founder and director of Fenceline Watch a Houston community-based environmental Justice effort dedicated to the eradication of toxic multigenerational harm on communities living along the fenceline of industry. We appreciate the maritime administration for the public comment period on the New Fortress Energy Louisiana FLNG Deepwater Port License application no. MARAD-2022. Environmental justice communities encompass low-income communities of color that often time also face issues of language isolation in public engagement processes, such as during this one. In our comment, you will read about the current location of the project, and the true cost to our Gulf Coast communities for generations to come.

I. CURRENT VULNERABLE ECONOMIES

New Fortress Energy Louisiana FLNG LLC would be located near Caminada Bay a popular fishing location and home to Champagne Bay oysters that have declined after the Deepwater BP Spill. It is one of many industries that have faced damages from the BP spill and coastal erosion that has caused flourishing areas to become too salty for oysters.¹

II. NATIONAL SIGNIFICANCE OF LOUISIANA COASTAL ECONOMY

The Coastal Protection and Restoration Authority has outlined the national significance of coastal Louisiana and MARAD should consider the impact New Fortress could cause. Two million people call coastal Louisiana home, many of who depend on local economies and infrastructure. 26% of the commercial fisheries in the continental U.S. reside along the coast of Louisiana. 5 million migratory

¹ <https://caminadaoyster.com/>



waterfowl depend on the Louisiana habitat as a migratory path that stimulates tourism in states like Louisiana.²

III. ECONOMIC IMPACT OF SPILLS

Both tourism and aquaculture sectors faced hardships after the BP oil spill. According to the Louisiana Office of Tourism, Tourism generates \$3.7 billion in direct income for sightseeing and the restaurant and beverage industry. The Louisiana seafood industry has an economic impact of \$2.4 billion annually.³ The BP oil spill occurred from April to September of 2010. An Economic Impact of the Gulf Oil Spill by Moody Analytics reported over 17,000 lost jobs.⁴

"The National Oceanic and Atmospheric Administration had closed about 80,000 square miles of the Gulf to fishing, mostly along the Louisiana coastline, though the closure extends as far east as Panama City FL."

A study by the U.S. Bureau of Ocean Energy Management reported an impact on the Gulf of Mexico commercial fishing industry of \$94.7 million to \$1.6 billion. With a drop of 65% fewer decapods (shrimp) and 54% fewer oysters than in 2009. Seafood retailers shifted their consumption to west coast supply only to shift to foreign markets.⁵

Dean Blanchard, a local shrimper who was one of the casualties of this spill, testified before Congress, "The shrimp died. It's a ghost town". He spoke about oil infrastructure banning fishers from areas they have shrimped for generations.⁶

IV. CROSS-STATE AIR POLLUTION

Our interest in this comment is in solidarity with our gulf coast neighbors and in efforts to protect our air quality as good neighbors. In 2019 a federal appellate court was one step closer to addressing ozone-forming pollution that crosses state lines making it harder for downwind states to meet Clean Air Act attainment deadlines. A three-judge panel on the U.S. Court of Appeals for the District of Columbia wrote a unanimous decision siding with affected communities. Both Texas and Louisiana are among 27 states to be affected by the Cross-State Air Pollution Rule.⁷ Texas being both upwind and downwind. Communities like ours have never met Clean Air Act standards so we ask MARAD and DOT to consider the effects of infrastructure like New Fortress Energy Louisiana FLNG on coastal communities in Louisiana as well as Texas.

² National Significance, <https://coastal.la.gov/whats-at-stake/national-significance/>

³

<https://www.crt.state.la.us/Assets/Tourism/research/documents/2019-2020/2019%20Louisiana%20Tourism%20Economic%20Impact%20Rev%20Report.pdf>

⁴ <https://www.economy.com/economicview/analysis/191641/The-Economic-Impact-of-the-Gulf-Oil-Spill>

⁵ Asian-Cajun fusion: shrimp from the bay to the Bayou Brasseaux et al. - University Press of Mississippi - 2022

⁶ <https://www.theguardian.com/environment/2010/jun/11/bp-oil-spill-shrimp-king>

⁷ <https://www.epa.gov/csapr/states-are-affected-cross-state-air-pollution-rule-csapr>



V. ECONOMIC & HEALTH COSTS ON COMMUNITIES

Extreme weather events in tropical storms and hurricanes have become more intense and frequent. Rising seas are likely to increase flood insurance rates and the deductible for wind damage in homeowners insurance policies.⁸ Roads, airports, railways, ports, and oil, gas, and petrochemical facilities face dangers from extreme weather and rising waters. Louisiana can lose \$7,000,000,000 from highway 1 closures. The devastation of our wetlands affects fisheries and increases freshwater depletion for our growing populations. These have effects not only on infrastructure but human health. Warmer air increases ground-level ozone and exacerbates everything from asthma and lung disease to premature deaths. We must limit human-caused rising temperatures.

Thank you for the opportunity to comment in efforts to stop multigenerational toxic harm. We hope you consider all of these concerns and those of community members before locking in decades of emissions and furthering damage to our beautiful Gulf Coast.

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⁸ <https://www.epa.gov/sites/default/files/2016-09/documents/climate-change-tx.pdf>