

May 31, 2024

President Joseph R. Biden  
White House  
1600 Pennsylvania Avenue, N.W.  
Washington, DC 20500

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

Dear President Biden and Secretary Granholm,

Thank you for protecting our climate and communities by pausing the licensing of new Liquefied Natural Gas (“LNG”) exports. The pause is an urgent first step toward stopping fossil fuel expansion and phasing out fossil fuel production. It is also an important opportunity not just to update the economic and environmental studies that the Department of Energy (“DOE”) relies on for evaluating the impacts of LNG export authorizations, but also to utilize its existing authority to implement a rigorous public interest test that will consider the full scope of environmental factors and impacts of exportation on communities.

DOE has the authority, and the obligation, to deny authorizations for export projects under the Natural Gas Act (NGA) when the impacts and harms of these exports outweigh their benefits to the public. Although the NGA does not define the public interest, it grants the agency broad powers to approve, modify, condition, or deny exports as “necessary or appropriate.”<sup>1</sup> To that end, DOE should include a rigorous environmental and climate justice analysis that details harms across the whole supply and delivery chain. **We urge DOE to utilize and incorporate the baseline set of criteria outlined in the attached [white paper](#) while updating its current studies.** Furthermore, we encourage DOE to develop guidance that incorporates all criteria and further informs its public interest determinations.

A robust public interest determination should utilize the best available science, include a comprehensive public engagement process to collect feedback from impacted communities, and take a hard look at an export project’s effects on environmental justice, public health, domestic energy costs, biodiversity, the climate, national security, the necessary transition away from fossil fuels, and the public at large. On behalf of millions of members and supporters we, the **310** undersigned organizations, endorse this minimum set of criteria, described in more detail in the attached white paper, which DOE must consider when evaluating the public interest. These factors include:

- *Global emissions and climate change* - DOE’s public interest determination must account for the growing evidence of climate harms stemming from fossil fuel production and export, and it should reflect U.S. commitments to begin a transition away from fossil fuels.

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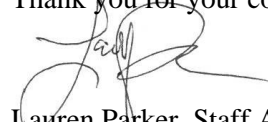
<sup>1</sup> 15 U.S.C.S. § 717b(a).

- Public health - When evaluating the air, water, and noise pollution concerns of proposed LNG exports as it relates to the public interest, DOE must review baseline air, water, and sound quality data at the location where the export facility is located and the impact of additional exports, as well as the resulting impacts of pollution on children, elderly, and other vulnerable populations.
- Environmental justice - LNG exports pose significant cultural, economic, and environmental harms as well as disproportionate health and safety concerns that should be evaluated and considered when determining whether an export authorization is in the public interest.
- Species extinction and biodiversity loss - DOE's public interest determination must consider the effect of LNG export approvals on the nation's biodiversity heritage. At a minimum, DOE's public interest determination should recognize and weigh the impacts to listed species, their habitat, and their chances of recovery.
- National security - In addition to considering the national security implications of accelerating climate change with continued LNG exports, DOE must also take a hard look at our country's current export capacity and the demand of our allies for LNG imports into the future when evaluating public interest.
- Local and national economic impacts - A public interest test should account for the potential to increase energy prices for U.S. consumers, threats to local economies, financial impacts from a worsening climate crisis, and other negative economic impacts from increasing the supply of LNG.
- The global energy transition - As we move towards a renewable energy future, DOE must consider this impending shift when determining the public interest and be wary of false solutions, like certified gas and carbon capture and storage ("CCS"), that perpetuate the continued use of fossil fuels.

This is not an exhaustive list, but a baseline set of concerns developed in deep consultation with impacted community members and legal experts. **We also urge the DOE to develop a better process to garner feedback from communities likely to be impacted by proposed exports and substantially involve the public when conducting public interest determinations.**

The Administration's decision to pause the approval of new export licenses is a positive first step, but it is past time for DOE to adopt a more robust public interest determination process that ensures protection for our frontline communities and domestic consumers from the harms of continued LNG expansion. We call on DOE to develop more rigorous studies and adopt criteria for public interest determination that adequately account for the climate, economic, environmental justice, national security, and public health harms that would result from the continued export of LNG. We believe that in most cases, a careful evaluation of the enclosed factors will result in the denial of additional LNG exports due to the catastrophic impacts of expanding our LNG export capacity on our environmental, cultural, social, and economic systems.

Thank you for your consideration,



Lauren Parker, Staff Attorney

Center for Biological Diversity

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### ***International Organizations:***

1. American Jewish World Service
2. Ben and Jerry's
3. Citizens' Resistance at Fermi 2 (CRAFT)
4. Climate Clock
5. Climate Reality Project Northern Colorado Chapter
6. Community Health
7. Cyber x Climate
8. Earth Guardians
9. Eco-Eating
10. EcoPoetry.org
11. End Fossil Occupy Uganda
12. Eyematters
13. GreenFaith
14. International Marine Mammal Project of Earth Island Institute
15. Laudato Si Movement
16. Malach Consulting
17. Mission Blue
18. Oil Change International
19. Plastic Pollution Coalition
20. Rainforest Action Network
21. Resilient40
22. SAVE THE FROGS!
23. Stand.earth
24. System Change Not Climate Change
25. The Last Plastic Straw
26. The Ocean Project
27. The People's Justice Council
28. The Resilient40
29. Vegan Flag
30. Waterkeeper Alliance
31. Women's Earth and Climate Action Network (WECAN)
32. Womxn From the Mountain

### ***National Organizations:***

33. 198 methods
34. Alaska Wilderness League
35. Alliance of Nurses for Healthy Environments
36. Animals Are Sentient Beings Inc
37. Animas Valley Institute
38. Aquarian Minyan
39. Beyond Extreme Energy
40. Bold Alliance
41. Businesses for a Livable Climate

42. CASA
43. CatholicNetwork US
44. Center for Biological Diversity
45. Climate Equity Policy Center
46. Climate Hawks Vote
47. Climate Organizing Hub
48. Common Defense
49. Democratic Socialists of America
50. Earthkeeper Health Resources
51. Earthworks
52. Empathy Surplus Network USA
53. Evergreen Action
54. Faculty Staff Divestment Network
55. Food & Water Watch
56. FracTracker Alliance
57. Friends of the Earth
58. Gen-Z for Change
59. George Mason University Center for Climate Change Communication
60. Global Warming Education Network (GWEN)
61. GreenLatinos
62. Greenvest
63. Grey Nuns of the Sacred Heart
64. Healthy Gulf
65. Higher Ground Initiative
66. Hip Hop Caucus Education Fund
67. Innovation pour le Développement et la Protection de l'Environnement
68. Institute for Policy Studies Climate Policy Program
69. Interfaith Power & Light
70. Intheshadowofthewolf
71. Jane Fonda Climate PAC
72. LaPlaca and Associates LLC
73. Mothers Out Front
74. Nicaragua Center for Community Action
75. North American Climate, Conservation and Environment (NACCE)
76. Nuclear Information and Resource Service
77. Nukewatch
78. Oxfam America

79. Pakistan Fisherfolk Forum
80. Paradise Las Vegas Indivisible
81. Pax Christi USA
82. People Power United
83. Presente.org
84. Property Rights and Pipeline Center
85. Protect All Children's Environment
86. Public Citizen
87. RapidShift Network
88. Resource Renewal Institute
89. Rise to Thrive
90. RootsAction.org
91. Save EPA
92. Save the Environmental Protection Agency
93. Sequoia ForestKeeper
94. Seventh Generation
95. Shareable
96. Small Business Alliance
97. Sunrise Movement
98. Syracuse Cultural Workers
99. The Quantum Institute
100. Third Act
101. Third Act Educators
102. TIAA-Divest!
103. Unitarian Universalist Association (UUA)
104. Unitarian Universalists for Social Justice
105. United Women in Faith
106. Zero Hour

***State and Local Organizations:***

107. 350 Bay Area Action
108. 350 Bucks County
109. 350 Colorado
110. 350 Eugene
111. 350 Hawaii
112. 350 Humboldt
113. 350 Mass
114. 350 New Hampshire
115. 350 Seattle
116. 350 Ventura County Climate Hub
117. 350 Juneau

118. A Community Voice (ACORN)
119. Accelerate Neighborhood Climate Action
120. Alabama Interfaith Power & Light
121. Alliance for Affordable Energy
122. Atchafalaya Basinkeeper
123. Bay Area-System Change not Climate Change
124. Be The Change - Colorado
125. Better Brazoria: Clean Air & Water
126. Bronx United Progressives
127. Californians for Western Wilderness
128. Call to Action Colorado
129. Capitol Heights Presbyterian Church
130. Citizens Alliance for a Sustainable Englewood
131. Central Jersey Environmental Defenders
132. Change Begins with Me
133. Charleston Climate Coalition
134. Chesapeake Climate Action Network
135. Church Women United in New York State
136. Citizens Action Coalition of IN
137. Citizens Caring for the Future
138. Ciudadanos del Karso
139. Clean Energy Action
140. Climate Action Rhode Island
141. Climate Conversation Brazoria County
142. Climate First: Replacing Oil & Gas (CFROG)
143. Climate Reality Project - Colorado
144. Colorado Businesses for a Livable Climate
145. Colorado Coalition for a Livable Climate
146. Colorado Democratic Party - Energy and Environment Initiative
147. Colorado Jewish Climate Action
148. Colorado Renewable Energy Society (CRES)
149. Colorado State University
150. Community for Sustainable Energy
151. Concerned Health Professionals of Pennsylvania

152. Cook Inletkeeper
153. Delaware Riverkeeper Network
154. Denver Democratic Socialists of America
155. Dine' Centered Research Evaluation
156. Don't Gas the Meadowlands Coalition
157. Earth Care Committee, St Andrews Pres, Austin, TX
158. Earth Ethics. Inc
159. Earth Ministry/Washington Interfaith Power and Light
160. East Valley Indivisibles
161. Eco-Justice Collaborative
162. Empower our Future
163. Endangered Habitats League
164. Environmental Council of Rhode Island
165. Environmental Justice Ministry of Emerson Universalist Unitarian Church
166. Escalante Wilderness Project
167. Extinction Rebellion Houston
168. Fox Valley Citizens for Peace & Justice
169. Freeport haven
170. Freshwater Accountability Project
171. Fridays for Future Orange County
172. Friends of the Bitterroot
173. Friends of the San Juans
174. Georgia Advancing Communities Together, Inc.
175. Georgia Interfaith Power and Light (GIPL)
176. Great Egg Harbor Watershed Association
177. Greater Boston Physicians for Social Responsibility
178. Greater New Orleans Climate Coalition
179. Greater New Orleans Housing Alliance
180. Greater Park Hill Community
181. Green House Connection Center
182. Green Party of Florida
183. Green Party of Onondaga County
184. Habitat Recovery Project
185. HealthLink (501C3)
186. Idaho Conservation League
187. Indivisible Ambassadors
188. Ingleside on the Bay Coastal Watch Association
189. Inspiration of Sedona
190. Interfaith Earth Keepers
191. Interstate 70 Citizens Advisory Group
192. Jewish Climate Action Network NYC
193. Jewish Climate Action Network, MA
194. Kewaunee CARES
195. Kickapoo Peace Circle
196. Larimer Alliance for Health, Safety, & the Environment
197. Littleton Business Alliance
198. Long Island Progressive Coalition
199. Loudoun Climate Project
200. Louisiana Bucket Brigade
201. Maine Unitarian Universalist State Advocacy Network
202. Make the Road PA
203. Maryland Ornithological Society
204. Massachusetts Interfaith Power & Light, Inc.
205. Mayfair Park Neighborhood Association
206. Mental Health & Inclusion Ministries
207. Metuchen-Edison-Piscataway Area Branch NAACP
208. Mid-Missouri Peaceworks
209. Mind's Eye Productions
210. Montana Environmental Information Center
211. Montbello Neighborhood Improvement Association
212. Mothers Out Front Colorado
213. Mountain Watershed Association
214. Nassau Hiking & Outdoor Club
215. Nature Coast Conservation
216. NC Alliance to Protect Our People and the Places We Live (APPPL)
217. NC WARN
218. NEC Solar
219. Network for a Sustainable Tomorrow
220. New Jersey State Industrial Union Council
221. New Mexico Climate Justice
222. New York Progressive Action Network

223. No Coal in Oakland
224. North Range Concerned Citizens
225. Northeast Oregon Ecosystems
226. Northern Arizona Climate Change Alliance
227. Northwest Bronx Indivisible
228. NYCD16 Indivisible
229. Oilfield Witness
230. Our Sacred Earth
231. Pelican Media
232. Pennsylvania Jewish Earth Alliance
233. People for a Healthy Environment
234. Physicians for Social Responsibility, Arizona
235. Physicians for Social Responsibility Pennsylvania
236. Pollution Free Society
237. Port Arthur Community Action Network (PACAN)
238. Prince George's County MD Peace & Justice Coalition
239. Progressive Democrats of America, Oregon Chapter
240. Project Outreach: The Frac Sand Sentinel
241. ProsperotyForRI.com
242. Protect PT
243. Quittapahilla Watershed Association
244. RATT Pack
245. Residents Allied for the Future of New York (RAFT)
246. Resilient Denver
247. Resist the Pipeline
248. Rio Grande International Study Center
249. Rhode Island Land Trust Council
250. Rocky Mountain Peace and Justice Center
251. Rowan Divest
252. Safe Energy Rights Group (SEnRG)
253. Salem Alliance for the Environment
254. San Bernardino Valley Audubon Society
255. San Luis Valley Ecosystem Council
256. Sane Energy Project
257. Santa Barbara Standing Rock Coalition
258. Santa Cruz Climate Action Network
259. Save Our Illinois Land (SOIL)
260. Schoodic Area Democratic Committee
261. Social Eco Education (SEE)
262. Sisters of St. Dominic of Blauvelt, New York
263. SoCal 350 Climate Action
264. Social Action Committee of the Ethical Culture Society of Essex County, NJ
265. Social Justice Ministry of Live Oak Unitarian Universalist Congregation of Goleta
266. Society of Native Nations
267. Solarize Albany
268. South Asian Fund for Education Scholarship and Training, Inc.
269. South Durban Community Environmental Alliance
270. South Shore Audubon Society
271. Southwest Organization for Sustainability
272. Spirit of the Sun
273. Sprout NOLA
274. Sunflower Alliance
275. Sunrise Columbia
276. Sunrise New Orleans
277. Sustainable CSRA
278. Sustainable Mill Valley
279. Sustainable Practices
280. Terra Advocati
281. Texas Campaign for the Environment
282. Texas Environmental Justice Advocacy Services
283. The Climate Alliance of Santa Cruz County
284. The Enviro Show
285. The Vessel Project
286. The Wei, LLC
287. Third Act Ohio
288. Tompkins County Climate Protection Initiative
289. Tongass Forest Women's Earth & Climate Action Network

290. Turtle Island Restoration Network  
291. Turtle Island Restoration Network  
292. Unitarian Universalist Fellowship of  
Hidalgo County Texas  
293. Unite North Metro Denver  
294. United Student Leaders  
295. United University Professions  
296. Upper West Side Recycling  
297. Valley Unitarian Universalist  
Congregation  
298. Vibrant Littleton  
299. Virginia Interfaith Power & Light  
300. Vote Climate

301. Wall of Women  
302. Wasatch Clean Air Coalition  
303. Waterspirit  
304. WE ACT for Environmental Justice  
305. WESPAC Foundation, Inc.  
306. West Dryden Residents Against the  
Pipeline  
307. West End Revitalization Association  
308. Western Slope Businesses for a Livable  
Climate  
309. Windham-Willimantic NAACP  
Environmental Justice Committee  
310. Working for Racial Equity